



U.S. Department of Agriculture

Office of Inspector General

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# Forest Service's Firefighting Succession Planning Process

Audit Report 08601-54-SF  
March 2010

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U.S. Department of Agriculture  
Office of Inspector General  
Washington, D.C. 20250



DATE: March 31, 2010

REPLY TO  
ATTN OF: 08601-54-SF

TO: Thomas L. Tidwell  
Chief  
Forest Service

ATTN: Janet Roder  
Audit Liaison

FROM: Gil H. Harden /s/  
Acting Assistant Inspector General  
for Audit

SUBJECT: Forest Service's Firefighting Succession Planning Process

This report presents the results of our review of the Forest Service's (FS) firefighting succession planning process. FS' written response to the draft report is included at the end of the report with excerpts and the Office of Inspector General's (OIG) position incorporated into the relevant sections of the report. Based on the written response, we have accepted FS' management decision for all the report recommendations except for Recommendation 19. FS has yet to provide us its response to this recommendation.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective action taken or planned and the timeframe for completion of the recommendation for which management decision has not yet been reached. Please note that the regulation requires a management decision to be reached on all recommendations within a maximum of 6 months from report issuance. Follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the assistance your staff provided to our auditors during our review.

# Table of Contents

<b>Executive Summary</b> .....	<b>1</b>
<b>Background &amp; Objectives</b> .....	<b>6</b>
<b>Background</b> .....	<b>6</b>
<b>Objectives</b> .....	<b>7</b>
<b>Section 1: Planning</b> .....	<b>8</b>
<b>Finding 1: National Workforce Plan Needed to Specifically Address Future Critical Firefighter Shortages</b> .....	<b>8</b>
<b>Recommendation 1</b> .....	<b>12</b>
<b>Recommendation 2</b> .....	<b>12</b>
<b>Recommendation 3</b> .....	<b>13</b>
<b>Recommendation 4</b> .....	<b>13</b>
<b>Recommendation 5</b> .....	<b>14</b>
<b>Section 2: Training</b> .....	<b>15</b>
<b>Finding 2: Fire Training Program Does Not Adequately Provide for Future Needs</b> .....	<b>15</b>
<b>Recommendation 6</b> .....	<b>19</b>
<b>Recommendation 7</b> .....	<b>20</b>
<b>Recommendation 8</b> .....	<b>20</b>
<b>Recommendation 9</b> .....	<b>21</b>
<b>Recommendation 10</b> .....	<b>21</b>
<b>Recommendation 11</b> .....	<b>21</b>
<b>Recommendation 12</b> .....	<b>22</b>
<b>Section 3: Availability</b> .....	<b>23</b>
<b>Finding 2: FS' Firefighting Ability Challenged by Lack of Participation</b> .....	<b>23</b>
<b>Recommendation 13</b> .....	<b>27</b>
<b>Recommendation 14</b> .....	<b>27</b>
<b>Recommendation 15</b> .....	<b>28</b>
<b>Recommendation 16</b> .....	<b>28</b>

Recommendation 17.....	29
Recommendation 18.....	29
<b>Finding 4: Unnecessary Education Requirements Compromise FS’ Firefighting Force .....</b>	<b>30</b>
Recommendation 19.....	33
Recommendation 20.....	33
<b>Scope and Methodology .....</b>	<b>35</b>
<b>Abbreviations.....</b>	<b>37</b>
<b>Exhibit A: Summary of Monetary Results .....</b>	<b>38</b>
<b>Exhibit B: Difference in Number of Qualified firefighters Versus Trainees in FS’Critical Firefighter Positions.....</b>	<b>39</b>
<b>Exhibit C: Estimated Percentage of Employees That Did Not Obtain Certification after Attending Training for Firefighting Positions.....</b>	<b>42</b>
<b>Agency’s Response.....</b>	<b>44</b>

# ***Forest Service's Firefighting Succession Planning Process***

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## **Executive Summary**

The Office of Inspector General (OIG) evaluated whether the Forest Service (FS) has adequately planned for the timely replacement of its critical fire management staff as retirements increase and fewer of the staff volunteer for fire-related assignments. Like most Federal agencies, FS faces a significant number of retirements during the next 5-10 years. Many of its fire management positions require several years of formal and on-the-job training in order to become certified for firefighting duties. Our audit assessed FS plans for recruiting, training, developing, and retaining those personnel who fill these critical fire management positions. We also identified other factors or barriers affecting FS' ability to develop and mobilize the fire management staff needed to fulfill its firefighting mission. Overall, we concluded that FS has not taken the necessary steps to ensure it has a sufficient number of qualified staff to meet its future wildland fire management responsibilities.

FS is currently regarded as the premier wildland fire management agency and a major partner in the Federal wildland fire management community. As part of its mission, FS protects life, property, and natural resources on 193 million acres of national forest system land and 20 million acres of adjacent State and private property. FS has also been increasingly tasked to respond to non-fire national emergencies like Hurricane Katrina. In 2009, wildfire management activities and non-fire national emergencies consumed almost 50 percent of FS' budget. The need for increased FS emergency response capability, coupled with the retirement of FS' aging workforce, is setting the stage for future shortages of qualified firefighters.<sup>1</sup> Workforce planning is designed to address such shortages by: (1) identifying the current skills, competencies, and capacity of FS' firefighter workforce; (2) evaluating what is needed to meet future challenges; and (3) developing specific actions to ensure the right people are in the right place at the right time to successfully complete the agency's wildfire suppression mission.

Our audit identified the following issues affecting FS' ability to fulfill its wildland fire mission as its firefighter workforce retires:

### **National Workforce Plan Needed Specific to Firefighters**

To fulfill its wildland fire responsibilities, FS has about 24,000 employees (70 percent of its workforce) who hold at least one of over 300 different types of firefighter qualifications. Of these, more than 4,300 are qualified for 54 positions that are most critical to firefighting because they involve essential fire command (e.g., incident commanders) and support activities (e.g., logistics section chiefs). In 2009, approximately 26 percent of these critical personnel were eligible to retire, increasing to 64 percent in 5 years and 86 percent in 10 years. These losses come as FS predicts an increase in both the size and number of fires it will be responsible for suppressing without a corresponding increase in budget resources. In short, FS will be fighting larger fires with fewer available critical firefighters. FS, however, has not developed a national workforce plan to ensure that personnel with critical firefighting

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<sup>1</sup> Throughout the remainder of this report the term "firefighter" refers to FS employees being trained or incident qualified to participate in wildland fire incidents and non-fire emergencies.

qualifications will continue to be available to meet FS' firefighting needs. FS had not made it a priority to develop such a plan because it believed the agency's general workforce planning process, which is based on employee job series numbers, was sufficient to cover any firefighter shortages. However, the job series numbers only identify FS' primary job occupations, such as GS-401 (General Biologist) and GS-810 (Civil Engineer). Firefighter positions such as incident commanders and logistics section chiefs are not identified by job series.

Most FS personnel become qualified to hold firefighter positions based on extra training and experience gained alongside their primary job occupations (e.g., biologist or engineer)—firefighting is a collateral duty. Since most employees' firefighter qualifications are not linked to their full-time jobs, a workforce plan based on job series would not provide the information needed to identify and address potential firefighter shortages. A lack of qualified firefighters due to retirements and inadequate planning could jeopardize FS' ability to accomplish its wildland fire suppression mission, resulting in the loss of more property and natural resources and increased safety risks to fire suppression personnel.

### **Firefighter Training Program Inadequate**

FS' firefighter training program does not ensure that sufficient staff are trained to fill positions that meet the agency's current or anticipated needs. Although inefficient, FS allows its employees to self-select firefighting courses and to self-determine the pace of their own progress because employee interest in firefighting is declining. FS is concerned that if employees cannot choose what positions to qualify for or are required to put their fire training to use, they may not volunteer for training, or they may not make themselves available for firefighting once qualified. As a result, FS' firefighter training program relies on employees' personal preferences coinciding with the agency's future needs, instead of ensuring that its training investment (\$29.5 million in 2005) yields adequate replacements.

Relying on employee preference to match agency needs has created imbalances between employees' chosen firefighter career paths and FS' needs. FS currently has more qualified firefighters in many critical positions than it has trainees preparing to replace them. Overall, FS has 11,129 critical firefighters and only 5,199 in training for these positions—just under half of what is needed to maintain current wildfire response levels. Since FS is already experiencing critical shortages and anticipates increased responsibility, the agency's demand for qualified firefighters may soon eclipse its supply of trained replacements.

Since employees set their own training pace, they take an average of 23 years to qualify for critical incident management positions such as section chiefs and incident commanders; this is an average of 12 years longer than the optimal timeframes that FS estimates are possible with more focused training. With an average age of 45 and suboptimal training progress, many trainees will be almost eligible to retire by the time they qualify for the critical positions for which they are training. Furthermore, under the current policy, FS estimates that 40 percent of employees who take fire training never follow through to qualify for a firefighter position, a potential waste of \$12 million annually.

### **Lack of Participation Challenges FS' Firefighting Ability**

FS' ability to effectively suppress wildfires is also challenged by a lack of participation from its firefighters. FS has trained and qualified many employees as firefighters but does not require them to actually participate during wildfire events or reward them for doing so. As a consequence, each fire season, FS experiences shortages of critical firefighter personnel even though it currently has sufficient numbers of staff trained and qualified to perform these functions. For example, in 2008, only 9 percent of FS' qualified firefighters actually took part in suppressing the agency's largest, costliest wildfires while the vast majority remained at home.

Employees who choose to volunteer and are called to duty are not rewarded for doing so, but are only evaluated and paid in terms of their primary job responsibilities (e.g., soil scientist). Similarly, qualified employees who do not volunteer are not penalized. Although FS directs its managers to ensure firefighters on their staff are available to participate in local, regional, and national wildland fire incidents as the situation demands, managers are also expected to ensure employees' primary work is accomplished. We concluded that having availability be voluntary and the lack of career incentives have caused most of FS' firefighters to list themselves as unavailable for the growing number of large, costly fires where they are needed most. This shortage of available firefighters affects FS' suppression strategies and timeframes. In addition, those firefighters who are available may be deployed more often and without full crews, which places them in stressful and dangerous situations. This disproportionate burden on the few who volunteer nationally and regionally may worsen over the next 10 years as 86 percent of FS' most experienced and qualified firefighters retire.

### **Unnecessary Education Requirements for Firefighters**

We found that FS' ability to fight fires may soon be compromised if FS continues to classify certain of its fire management staff under a job series for natural resources management and biological sciences (GS-401). The series makes academic course work a precondition for employment, but many FS staff may not meet this requirement by an October 2010 deadline established by the Office of Personnel Management (OPM). Although intended to increase safety by upgrading certain fire management staffs' educational requirements, classifying these staff under the GS-401 series will likely have the opposite effect. FS may soon be fighting fires with less than half of its key fire management staff available to oversee firefighting operations and firefighter safety. Further, FS has invested considerable resources (by our estimates \$15.7 million) in employees taking classes required by the job series (e.g., college physics), but which are only loosely related to their jobs (e.g., fire program manager).

Our review concluded that the lack of a connection between the GS-401 series' academic requirements and fire staffs' professional proficiency could diminish FS' firefighting effectiveness and safety. It could also affect FS' firefighter succession planning because there will be fewer veteran managers to mentor the next generation of firefighters and make it more difficult for FS to recruit new firefighters in States like California where firefighting organizations have no such education requirement. We reported this issue to the former FS Chief in November 2008 in a management alert that recommended FS discontinue using the GS-401 job series to classify certain members of its fire management staff. We also

recommended that FS coordinate with OPM to develop an alternative to classifying the fire management positions under the GS-401 job series. The former FS Chief agreed to assess the recommended actions in our report and to develop the appropriate policy and job series classifications that meet FS' operational needs.

## **Recommendation Summary**

To ensure that FS adequately plans for the timely replacement of its firefighting workforce, we recommend that FS:

- Assign responsibility for firefighter qualification workforce planning to a top-level official at FS' national headquarters and establish a team to initiate, guide, and monitor the agency's firefighter workforce planning process.
- Develop a national workforce plan based on firefighters' position qualifications that focuses on identifying, assessing, and meeting specific workforce needs relative to FS' strategic goals and objectives.

To ensure its firefighting workforce is adequately trained in the most cost-efficient manner possible, we recommend that FS:

- Identify current and anticipated local, regional, and national firefighter needs and develop specific training accomplishment targets to measure progress in meeting them and incorporate the targets into managers' annual evaluations.
- Direct FS employees who elect to participate in firefighter training to pursue firefighter qualifications according to the agency's local, regional, and national needs.
- To encourage employees to obtain certifications in those firefighter positions where they are most needed, create incentives, such as cash awards and formal recognition, for those employees who complete their certifications.
- Hold employees accountable for the timely completion of their firefighter training by incorporating assessments of their progress into their individual development plans and annual evaluations or by creating firefighter training contracts with specific requirements and consequences for non-performance.

To ensure that adequate numbers of firefighters are available when needed, we recommend that FS:

- Identify optimal participation numbers and require qualified firefighters and trainees to be available for local, regional, and national fire assignments according to FS' needs.
- Direct managers to adjust performance targets to reflect firefighting participation and modify managers' performance evaluations to include staff's firefighting availability.

- Evaluate whether incentives such as increased pay for performance would significantly increase employee participation. If so, determine the cost benefit of implementing such a change.
- Immediately discontinue the use of the GS-401 job series for those fire management positions discussed in the report and coordinate with OPM to develop an alternate approach, such as creating a new wildland firefighter series, or classifying staff under existing series with more appropriate experience and training requirements

### **Agency Response**

In its written response to the audit report, FS generally concurred with all the audit findings and recommendations. The complete written response is included at the end of the report.

### **OIG Position**

Based on FS' written response and estimated completion dates for corrective actions, OIG accepts FS' management decision on all but one of the audit recommendations. FS has yet to respond to the remaining recommendation.

## **Background & Objectives**

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### **Background**

The Forest Service (FS) is currently regarded as the premier wildland fire management agency and a major partner in the Federal wildland fire management community. As part of its mission, FS protects life, property, and natural resources on 193 million acres of national forest system land and 20 million acres of adjacent State and private property. Wildfire management represents a significant portion of FS' program activities, increasing from 13 percent of its total budget in 1991 to 48 percent in 2009, and incurring costs exceeding \$1 billion in 6 of the last 8 years.

Wildfire management is a massive endeavor that requires FS to train and qualify large numbers of employees. About 24,000 FS employees (70 percent of its entire workforce) hold some type of firefighter qualification, ranging from entry-level firefighters wielding axes and shovels on the fire line, to incident commanders responsible for overall management of wildland fire incidents.<sup>2</sup> According to FS, about half of its firefighters are full-time fire management staff whose primary job includes fire-related duties like fire education, prevention, and operations. The other half are fire militia—employees whose primary jobs involve non-fire duties like recreation, timber, or wildlife management.

FS' firefighter workforce is shrinking as significant numbers of employees begin to retire. FS estimated that 30 percent of its workforce was eligible to retire in 2005.<sup>3</sup> At the same time, FS' need for qualified firefighters is increasing. Drought and accumulated hazardous fuels (e.g., dry brush) have led to increasing numbers of large, complex wildfires that are more costly to suppress. For example, in 2008, large fires (i.e., those fires equal to or greater than 300 acres) burned 1.7 million acres of FS land and cost \$1.5 billion to suppress. This increase in fire duration and severity is severely taxing available firefighting resources with shortages of critical firefighters occurring each season.

FS' responsibilities under the National Response Plan also put substantial demands on its wildland firefighting resources. Over the last decade, FS has been increasingly tasked to respond to non-fire national emergencies like Hurricane Katrina. In 2005, for example, FS' wildfire teams spent 40 percent of their time responding to non-fire events. If extreme fire and non-fire events were to occur simultaneously, FS might lack the ability to respond accordingly. In addition, the same people needed to manage FS' wildfire incidents also have full-time non-firefighting jobs in their home units. During an increasingly longer portion of the year, the competing interests of firefighter support and critical work at home create escalating tensions for employees and their supervisors. The need for increased FS emergency response capability, coupled with the retirement of FS' aging workforce, is setting the stage for critical shortages of qualified firefighters in the future. Workforce planning is designed to address such shortages by: (1) identifying the current skills, competencies, and capacity of FS' firefighter workforce; (2) evaluating what is needed to meet future challenges; and (3) developing specific actions to

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<sup>2</sup> Throughout the remainder of this report, the term "firefighter" refers to FS employees being trained or incident qualified to participate in wildland fire incidents and non-fire emergencies.

<sup>3</sup> Source: National Forest Fire Management Officer's Conference "Snapshot of the Fire Workforce", January 2000.

ensure the right people are in the right place at the right time to successfully complete the agency's wildfire suppression mission.

FS' firefighter capabilities are critical because they directly impact its ability to protect natural resources, property, and human lives. A lack of qualified firefighters due to retirements and inadequate planning could jeopardize FS' accomplishment of its wildland fire suppression mission, with a resulting loss of significantly more land and structures and increased safety risks to fire suppression personnel.

## **Objectives**

Our primary objective was to evaluate whether FS has adequately planned for the timely replacement of its critical wildland fire personnel as retirements increase and fewer staff volunteer for fire assignments. More specifically, we assessed FS plans for recruiting, training, developing, and retaining those personnel who fill critical firefighter positions. We also identified other factors or barriers affecting FS' ability to develop and mobilize firefighters needed to fulfill its primary wildfire suppression mission.

Details of our audit methodology can be found in the Scope and Methodology section at the end of this report.

## Section 1: Planning

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### Finding 1: National Workforce Plan Needed to Specifically Address Future Critical Firefighter Shortages

FS does not have a national plan to manage its future firefighting workforce needs. FS had not made it a priority to develop such a plan because it believed the agency's general workforce planning process, which is based on employee job series numbers, was sufficient to cover any firefighter shortages. However, the job series numbers only identify FS' primary job occupations such as GS-401 (General Biologist) and GS-810 (Civil Engineer). Firefighter positions such as incident commanders and logistics section chiefs are not identified by job series. A workforce plan based on job series would therefore not provide the information needed to identify and address potential firefighter shortages. Without a plan specific to firefighters, FS' continued effectiveness in protecting the nation from wildfires and in ensuring firefighter safety may be undermined by the increasing loss of experienced staff who are succeeded by fewer, unsuitably skilled replacements.

The U.S. Department of Agriculture's (USDA) Strategic Human Capital Plan directs agencies, including FS, to develop workforce plans that address mission critical occupations. To accomplish this, FS designed a planning process that provides a framework for making workforce decisions tied to its national strategic goals and objectives. This process and the resulting workforce plan are intended to give FS' management the means to address long-term human resource issues, such as the changing mix of available skills and competencies due to retirement. FS' overall workforce planning purpose is to ensure that "the right people with the right skills and competencies are in the right job at the right time to carry out the Agency's mission."<sup>4</sup> The overall plan focuses on FS' primary job occupations (e.g., GS-401 General Biologist and GS-810 Civil Engineer). It does not address its critical firefighter positions (e.g., incident commanders and logistics section chiefs).

To fulfill its wildfire management responsibilities, FS has trained and qualified about 24,000 employees to perform over 300 different firefighter functions. Of these, more than 4,300 are qualified for 54 positions that are most critical to firefighting because they involve essential fire command (e.g., incident commanders) and support (e.g., logistics section chiefs).<sup>5</sup> As shown in the chart below, in 2009, approximately 26 percent of these firefighters were eligible to retire, with 64 and 86 percent becoming eligible in the next 5 and 10 years, respectively.<sup>6</sup> In addition, the average age of those qualified to hold these critical positions is 50 years old,<sup>7</sup> which, given a mandatory retirement age of 57 for many,<sup>8</sup> means that FS will soon lose a significant number of qualified firefighters. These losses come as FS predicts an increase in both the size and number of fires it will be responsible for suppressing without a corresponding increase in budget resources. In short, FS will be fighting larger fires with fewer available firefighters. FS, however,

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<sup>4</sup> FS' Workforce Planning Guide p.5 (September 2007).

<sup>5</sup> Critical firefighting functions were determined through FS interviews and incident management team roster reviews.

<sup>6</sup> While the majority of our analysis focused on 4,316 FS firefighters holding critical incident qualifications, the retirement eligibility percentages were based on 3,563 critical FS firefighters where retirement information was available.

<sup>7</sup> The estimate of 50 years is based on the weighted average ages of 4,316 FS employees holding a combined 11,129 critical firefighter qualifications. (See exhibit B.)

<sup>8</sup> Personnel in any of FS' job series may qualify to hold any fire position, which is considered a collateral duty. However, some FS staff have full-time positions with a mandatory retirement age of 57, while others do not.

has not developed a national workforce plan to ensure that personnel with critical firefighting qualifications will continue to be available to meet FS' firefighting needs.

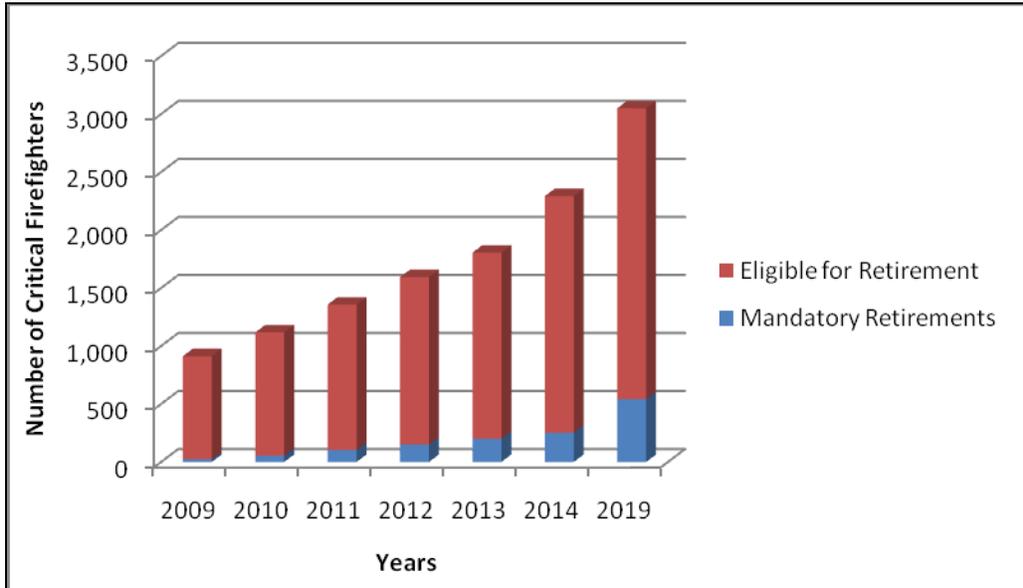


Chart Showing Retirement Projections for FS' Firefighters<sup>9</sup>

Internal and external reports have long recognized FS' need for firefighter workforce planning to maintain its wildfire response capability.<sup>10</sup> In 2000, for example, an FS fire report warned:

*A very serious problem is developing. Fires have become more difficult to control and the overall wildland fire suppression capability has decreased. During heavy fire seasons, there are simply not enough critical resources to meet demand. This combined with an aging workforce and a fire management cadre that is smaller and less experienced than in the past puts the agency at a critical juncture.*<sup>11</sup>

The 2000 report urged FS to address its diminished wildland fire suppression capability immediately. Over 10 years later, FS still has not taken sufficient actions to ensure it has the firefighters needed to accomplish its wildfire suppression mission.

While FS has not conducted national workforce planning for firefighters, the agency has developed an overall workforce plan. The overall plan focuses on FS' primary job occupations (e.g., GS-401 General Biologist and GS-810 Civil Engineer) but does not address its critical firefighter positions (e.g., incident commanders and logistics section chiefs). FS officials believed workforce plans based on employee job series met the organization's succession planning needs and that creating an agency-wide plan specific to firefighters was unnecessary. However, FS personnel typically become qualified to hold firefighter positions based on extra

<sup>9</sup> The retirement rates represent the cumulative effect of FS' critical firefighters eligible to retire between 2009 and 2019.

<sup>10</sup> *Policy Implications of Large Fire Management: A Strategic Assessment of Factors Influencing Costs*, prepared by Forest Service State & Private Forestry (January 2000); *Federal Wildfire Activities: Current Strategies and Issues Needing Attention*, U.S. General Accounting Office (August 1999); and *Quadrennial Fire and Fuel Review Report*, prepared by various Federal fire management task groups (June 2005).

<sup>11</sup> *Policy Implications of Large Fire Management: A Strategic Assessment of Factors Influencing Costs*, prepared by Forest Service State & Private Forestry (January 2000).

training and experience gained alongside their primary job occupations (e.g., biologist or engineer)—firefighting is a collateral duty. Since most employees' firefighter qualifications are not linked to their full-time jobs, a workforce plan based on job series does not provide information about firefighter qualifications. For example, a biologist may be qualified as an incident commander, but a workforce analysis focused on that job series will show the need for another biologist, not a firefighter.

Because potential firefighter shortfalls had not been nationally identified and assessed, managers gave coordinated firefighter succession planning a lower priority, believing that FS had always had sufficient firefighters in the past and would continue to do so in the future. Others believed specific firefighter staffing needs were best identified and addressed at the local level. National direction for firefighter succession planning consisted of internal directives reminding managers of the need to develop additional firefighters. For example, in 2008, FS' national office directed regional foresters to identify firefighting positions that were nationally recognized as being in short supply and to take steps to fill them (e.g., training and outreach). However, this memorandum left each region to decide for itself what firefighting positions were facing national shortages, how many staff the region should contribute, and when action should be taken.

When we interviewed FS staff they had different perspectives about the agency's firefighter needs. The absence of specific agency-wide goals or timeframes resulted in an uncoordinated, undefined approach that had a detrimental effect on FS' long-term, national firefighting staffing needs. Delegating succession planning to the regional (or local) level also left FS without a way to respond to shifting, national needs. For example, several FS regions have initiated fire management workforce plans, but these plans focus on replacing full-time fire staff (e.g., fire program manager) instead of employees who are qualified to be firefighters (e.g., incident commander). Further, without specific goals and timeframes, FS is neither able to measure its national progress in succession planning nor to hold regions accountable for their achievements.

FS should develop a national workforce plan based on firefighters' position qualifications, integrating budget, human resources, and strategic interests in a planning process that:

- analyzes current resources (e.g., establishes a baseline of needed firefighter qualifications),
- determines future needs based on agency-wide strategies and objectives,
- forecasts likely firefighter qualification shortages and surpluses based on projected retirements and attrition,
- develops action plans with specific regional and unit goals to address shortages and establishes timelines to accomplish them, and
- evaluates implemented measures to ensure that they are timely and effective.

FS' workforce planning guide offers these elements as the basic components for determining future personnel needs. In order to make these determinations, however, FS needs to enhance its ability to analyze its firefighting workforce.

Currently, FS maintains employee information in two separate databases: the Incident Qualification and Certification System (IQCS) and the Human Resources (HR) System. IQCS identifies employees' firefighting qualifications and training status but is not linked to HR, which

holds personnel data such as job series and retirement eligibility. As a result, FS can use IQCS to determine the firefighting skills held by its employees and the status of staff being trained to replace them, but it cannot forecast likely shortages based on pending retirements. Conversely, based on HR data, FS can determine that it will need another biologist in 2011 to replace someone eligible for retirement that year. However, FS cannot forecast its need to replace that person's incident commander skill, because their fire qualifications are recorded separately in IQCS.

Until recently, FS had the ability to use employees' social security numbers in each database to link personnel information in HR to employees' firefighting skills in IQCS. However, in September 2007, USDA restricted the use of social security numbers in HR in order to protect employees' privacy. Instead, the Department directed agencies to establish alternate unique identifiers for employees. FS has stopped using social security numbers in IQCS, but has not developed alternate identifiers to link employees in both databases.

Given FS' need to conduct accurate firefighter workforce analyses, we recommend that FS develop a unique identifier for each employee to link its HR and IQCS databases.<sup>12</sup> This will allow FS to analyze its current firefighting resources (qualifications and trainees) in IQCS and to project future shortages and surpluses based on relevant HR data such as retirement eligibility dates, employees' ages, etc.

We also recommend that FS' unique code identify employees as either fire staff or fire militia. FS' fire staff perform fire-related work such as removing excess brush from national forests, while militia perform FS' non-fire-related work, such as timber and natural resource management. Although either group may qualify as firefighters, the two differ in several aspects that are important for workforce succession planning. For example, many fire staff have mandatory retirement at 57 while most militia do not. In addition, while fire staff may be required to qualify for firefighting positions, fire militia must volunteer to do so. Further, fire staff have opportunities to learn about firefighting as part of their daily work and so may be more likely to train and deploy than militia, who may rarely interact with FS' firefighting program. According to FS, currently about half of its firefighters are militia. Identifying whether employees belong to fire staff or fire militia allows FS to forecast its replacement needs due to mandatory retirement and focus firefighting outreach and recruitment by analyzing participation trends specific to each group.

We further recommend that FS make succession planning for its firefighting program a high priority by assigning responsibility for successfully implementing firefighter workforce planning to a top level official at FS' national headquarters and establishing a firefighter workforce planning team to initiate, guide, and monitor the agency's planning efforts. FS should specify regional and unit level goals and timeframes in relation to predicted national firefighter qualification needs. Together, these steps will enable FS to address the coming loss of qualified firefighters, measure its progress in managing its firefighting workforce, and hold managers accountable. These steps will also help FS ensure that enough firefighters are available when and where the agency needs them to accomplish its wildfire suppression goals and objectives.

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<sup>12</sup> Employees' names are not suitable for unique identifiers because they change due to marriage or preference, and may also be inconsistently keyed into the databases (e.g., "Robert Jones" in HR and "Bob Jones" in IQCS).

FS must create a workforce planning process that addresses the agency's firefighter qualification needs. Without it, FS may not be able to meet its wildfire suppression responsibilities because it will lack qualified firefighters to replace personnel as they retire. The level of firefighter safety may also decrease as FS supplements its firefighting force with non-agency personnel trained and certified to different standards. In addition, FS' reliance on other fire management agencies to provide needed firefighter personnel due to its insufficient planning could both increase FS' already significant wildfire suppression expenditures through the higher costs of using non-FS employees and jeopardize the response capabilities of both FS and the assisting agencies.

### **Recommendation 1**

Assign responsibility for firefighter qualification workforce planning to a top level official at FS' national headquarters.

### **Agency Response**

FS concurs with this audit recommendation and will assign the responsibility for firefighter qualification workforce planning to the Director, Fire and Aviation Management (FAM). The Director, FAM, will work in close coordination and support with the Director, Human Resources Management (HRM). This firefighter qualification workforce planning process will address firefighter position qualifications for all firefighters, including the militia. This relationship and expected results will be formally documented in a letter to both the Directors. FS' estimated completion date for this action is April 15, 2010.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 2**

Establish a team to initiate, guide, and monitor the agency's firefighter workforce planning process.

### **Agency Response**

FS concurs with this audit recommendation and will establish an interdisciplinary "Workforce and Succession Planning Strategic Team" (WfSST) that includes staff from HRM, FAM, and other national, regional and local line and staff, as applicable. The WfSST will be formed to focus on creation of a Strategic Plan for redesigning the agency's firefighting business model. The Director of FAM will designate a program manager for this Team who will report directly to the Director, FAM. The WfSST Program Manager will initiate, guide, and monitor the agency's overall workforce planning effort, which will cover fire management positions and the "militia," utilizing FS workforce planning efforts underway. Currently the FS uses the Workforce Planning and Program Analysis (WfP&PA) tool and develops a Workforce Plan to facilitate workforce planning throughout all levels of the agency. The agency will build on those efforts, but will address all firefighters, not just

those job codes specific to fire management. FS' estimated completion date for this action is April 30, 2010.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 3**

Create a unique identifier for each FS employee in both the IQCS and HR database that codes the employee's position as fire staff or fire militia to facilitate analysis needed to support firefighter workforce planning.

### **Agency Response**

FS concurs with this audit recommendation. This task will be coordinated by the FAM WfSST Program Manager. The Program Manager will work in collaboration with HRM to determine the needed resources, the feasibility of the work, the resources required to implement such an identifier, and implications to other agencies and cooperators. This action is likely to require a full year for the feasibility study alone. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 4**

Develop a national workforce plan based on firefighters' position qualifications that focuses on identifying, assessing, and meeting specific workforce needs relative to FS' strategic goals and objectives and that establishes specific regional and unit goals and timeframes in relation to national firefighter qualification needs.

### **Agency Response**

FS concurs with this audit recommendation. Development of the National Firefighting Workforce and Succession Plan, which will address firefighter position qualifications for all firefighters, including the militia, will be overseen by the WfSST established in response to Recommendation Number 2, by working closely with the HRM Workforce Planning unit. The analysis of current staffing and current known vacancies will be assessed near term using current workforce planning tools and other efforts underway at the FS. The ensuing plan will form the basis for redesigning the agency's current firefighting business model and will address all firefighters, including the militia. Each region will assess the extent and nature of its respective FAM organizations and militia responders based on metrics which characterize fire occurrence, fuel types, fuels treatment/fire recurrence intervals, coordination, cooperative

capability, etc. Currently each Region utilizes the WfP&PA tool to address workforce planning. Regional data is included in a standard template and published in Workforce Plans as required by HRM guidance. As the regional plans are broadened to address all firefighters, including militia, and then finalized, the Regional plans can then be rolled up into the overall National Workforce and Succession Plan. FS' estimated completion date for this action is January 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 5**

Develop specific action plans and timelines for regional and unit managers to follow in meeting the firefighter position qualification needs identified in Recommendation 4.

### **Agency Response**

FS concurs with this audit recommendation. Currently, each Region utilizes the WfP&PA tool to address workforce planning. Regional data is included in a standard template and published in Workforce Plans as required by HRM guidance. As the Regional plans that address all firefighters are finalized, the Regional plans can then be rolled up into the overall National Workforce and Succession Plan that will address all firefighters, including militia. The combined Regional responses will comprise the basis for the national Firefighting Workforce and Succession Plan (ref. response to Recommendation Number 4). Action plans will be prepared by the local units and compiled by each Region identifying how to meet all firefighter position needs identified in the National Firefighting Workforce and Succession Plan. The Plan will note specific timelines to meet national objectives. FS' estimated completion date for this action is January 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## Section 2: Training

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### Finding 2: Fire Training Program Does Not Adequately Provide for Future Needs

FS' firefighter training program does not ensure that sufficient staff are trained to fill positions that meet the agency's current or anticipated needs. This occurred because FS allows employees to self-select firefighting courses and to self-determine the pace of their progress. Because employee interest in firefighting is declining, managers have been concerned that if employees cannot choose what positions to qualify for or are required to put their fire training to use, they may not volunteer for training, or they may not make themselves available for firefighting once qualified. As a result, FS' firefighter training program relies on employees' personal preferences coinciding with the agency's future needs, instead of ensuring that its training investment (\$29.5 million in 2005)<sup>13</sup> yields adequate replacements. With no coordination between qualified firefighters and those training to replace them, this practice may compromise FS' future firefighting effectiveness.

FS' firefighter training program consists of both formal classroom training and field experience. Participation in both types of firefighter training is optional for most FS employees.<sup>14</sup> According to FS policy, if employees agree to train, their preferences are to be considered,<sup>15</sup> but FS managers should ensure that training produces firefighters in positions that meet the agency's needs.<sup>16</sup> For example, an employee may want to learn how to operate a bulldozer on a fire, but if FS has a more pressing need for incident commanders it could direct the employee to train for that position. According to FS practice, however, FS managers allow employees to select their own training because the agency is concerned about lower interest and participation in firefighting.

This practice has not motivated employees to pursue critical firefighter positions or resulted in timely completion of their firefighter training. It has also not resulted in higher firefighter participation. Despite choosing their own training, only 9 percent of FS' qualified firefighters volunteer for national and regional fires. These are usually FS' largest and costliest fires. Relying on employee preference to match agency needs has also led to a gap between FS' current complement of critical firefighters and the trainees preparing to replace them. Currently, FS has 11,129 critical firefighters but only 5,199 employees training to replace them.<sup>17</sup> At the same time, FS faces a coming wave of retirements. According to our analysis, 64 percent of critical firefighters can retire in 2014, and 22 percent more will be eligible by 2019.

In addition, with training proceeding at an employee-determined pace, trainees take longer than necessary to qualify for critical firefighting positions. For example, as shown in the chart below, trainees average 23 years to qualify for three groupings of critical incident management

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<sup>13</sup> We could only obtain FS' firefighter training costs for 2005. FS does not currently track its training costs specific to firefighting.

<sup>14</sup> Some fire staff positions require specific firefighter training, such as Supervisory Fire Engine Operators.

<sup>15</sup> FSH 5109.17.04.4 (August 2007).

<sup>16</sup> FSM 5103.1 (June 2005), 5126.02 and 5126.03 (July 2005).

<sup>17</sup> Because FS employees may be qualified or trained in more than one critical position, the numbers cited represent incident positions rather than unique individuals.

positions, or an average 12 years longer than the optimal timeframes that FS estimates are possible with more focused training.

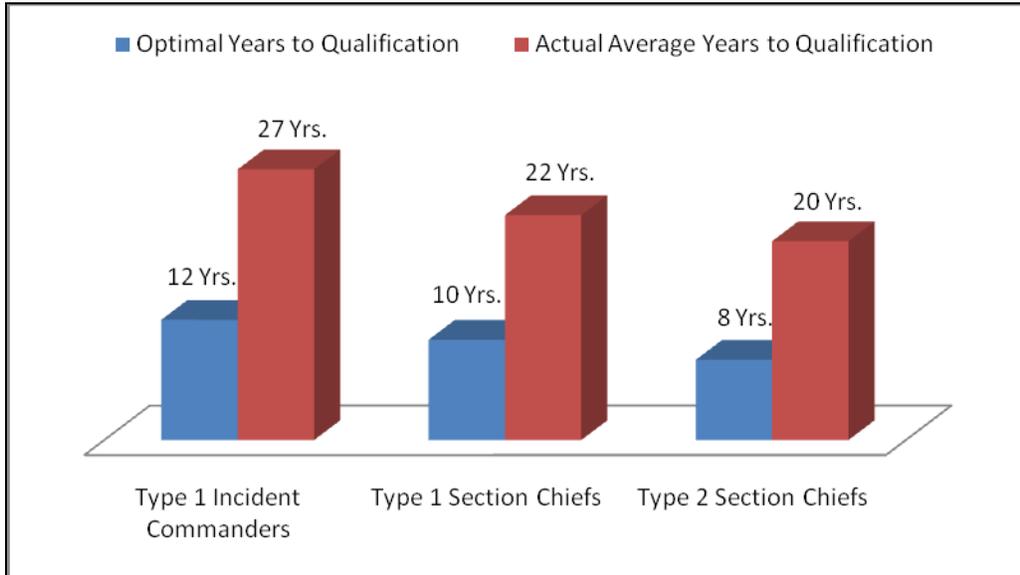


Chart Showing Actual Versus Optimal Time to Qualify for Firefighter Positions

With an average age of 45 and suboptimal training progress, many trainees will almost be eligible to retire by the time they qualify for the critical positions for which they are training (see exhibit B). FS incurs greater costs providing training that takes too long and does not address its needs.

To date, even though critical firefighter shortages are occurring, FS has not addressed the conflict caused by allowing employees to choose their own training. Further, the agency's responsibilities are escalating. Although FS has not analyzed its current or anticipated need for firefighters (see Finding 1), the agency predicts that more mega-fires will occur in the coming years and that fires in general may be larger due to accumulated hazardous fuels (e.g., underbrush).<sup>18</sup> In addition, FS' firefighters have been increasingly used for national emergencies (e.g., natural disasters). Without ensuring that its training program timely provides qualified replacements, FS may face meeting such challenges with about half of its current critical firefighting force, which will negatively impact both safety and effectiveness.

Without sufficient numbers of trained firefighters, FS may also be facing significant cost increases if fires that could be quickly contained instead grow into larger and costlier mega-fires. Lack of trained replacements can also increase FS' costs since using other agencies' firefighters can be significantly more expensive for FS to mobilize. For example, State firefighters from the California Department of Forestry and Fire Protection are paid on a "portal to portal" basis (from the time they leave their house to the time they return) rather than the 14-hour shifts typically worked by FS firefighters. As a result, FS estimated that it spent an additional \$25 million on a single wildfire incident by using California firefighters rather than FS or other Federal employees.

<sup>18</sup> Mega-fires are wildfires that are extraordinary in size, complexity, and resistance to control.

To mitigate these effects and to improve its firefighter training program, FS should (1) facilitate training that corresponds with current and anticipated needs, and (2) oversee trainees' progress, including required on-the-job training, in order to ensure that they timely qualify.

#### Facilitating Training Based on Agency Needs

FS managers approve individual development plans for employees who want to train for various firefighting positions. According to FS policy, the development plans should balance the employees' training interests against the agency's firefighting needs. However, FS managers approving training do not know the agency's firefighter needs because that information has not been officially determined. In addition, employee interest in firefighting is decreasing due to conflicting demands, longer fire seasons, and lack of incentives. To encourage interest in firefighting, managers allow employees to pursue the training they prefer. FS neither requires employees to train for certain positions nor holds managers accountable for approving training that does not meet the agency's needs.

Employee-driven training has created imbalances between employees' chosen firefighter career paths and FS' needs. In all but two critical firefighter positions, there are significantly more qualified firefighters than trainees preparing to replace them. For example, as of 2008, FS had 27 firefighters qualified as type 1 incident commanders (responsible for on-the-ground strategy and tactics) and 3 corresponding trainees. Similarly, FS had 1,171 division supervisors and 363 trainees. Overall, FS has 11,129 firefighters qualified for critical positions and only 5,199 in training for these positions—just under half of what is needed to maintain current wildfire response levels (see exhibit B). Since FS is already experiencing critical shortages and anticipates increased responsibility, the agency's demand for qualified firefighters may soon eclipse its supply of trained replacements.

#### Monitor Trainees to Ensure Timely Progress

FS does not monitor trainees' progress adequately to ensure that they are on track to timely obtain their firefighter qualifications. Fire training officers are responsible for counseling current and prospective firefighter trainees and preparing and prioritizing fire training nominations. However, many forests (an FS administrative division) have no fire training officer on staff, while others assign fire training functions as a collateral duty that may or may not get done depending on the designated employee's primary job responsibilities. In general, trainees are left to progress through the firefighter qualification system without direction and according to their own timeline.

According to estimates by FS' training officers, about 40 percent of employees take fire training but never qualify for a firefighter position. We estimate that FS may be spending \$11.8 million annually for employees who attend fire training courses but who do not qualify for firefighter positions.<sup>19</sup> For some critical positions, this inefficiency is even greater (see exhibit C).<sup>20</sup> Since trainees are neither accountable for nor guided along any particular course

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<sup>19</sup> Although FS does not track its fire training expenditures, we estimated its annual cost to be about \$11.8 million by multiplying \$29.5 million (the amount FS spent on fire training that it reported to Congress in fiscal year 2005) by 40 percent (FS' estimated training inefficiency rate).

<sup>20</sup> Exhibit C lists only a small percentage of the 361 firefighter positions available to FS employees and reflects instances where we had sufficient data to perform our analysis. Other firefighter positions not listed may also have significant training inefficiencies.

of training, many use a scattershot approach. They may take a few courses towards qualifying for a position and then switch midstream for another, or they may take courses that cumulatively do not progress to any position. This approach results in a large training investment with minimal return. For critical positions, FS trainees are, on average, 45 years of age—and in some cases they may take up to 27 years to qualify for a top-level firefighter position such as a type 1 incident commander.

Further, if employees do not get adequate on-the-job field experience within 3 to 5 years after receiving formal classroom training, they may need to retake their courses. Although FS policy requires managers to deploy trainees in a timely fashion to ensure that the effectiveness of their training is not lost, the agency has not assigned this responsibility. Instead, trainees are mobilized based on a network of informal connections between training officers and the incident management teams assigned to wildfires. In 2008, approximately 34 percent of trainees did not receive timely on-the-job experience.

A 2008 training study concluded that there was a marked improvement in firefighter training when dedicated training officers were on site.<sup>21</sup> Another 2001 study determined that 74 percent of FS staff found the absence of clear career paths hindered their participation in firefighter training.<sup>22</sup> These studies indicate an opportunity for FS to improve its training program by employing full-time training officers to oversee trainees' progress.

In conclusion, FS needs to ensure that its training program is adequate to meet the twin challenges posed by increasing demands on its resources and rising retirement rates. Several studies over the years have reached similar conclusions, but they have not established timeframes or mechanisms for addressing the challenges.<sup>23</sup> For example, in 2008, FS participated in an interagency study that concluded that the current fire training process was “highly inefficient” and recommended a more effective use of training resources, such as basing firefighter training on agency needs, creating incentives for employees to pursue critical firefighter positions, and obtaining management and employee commitments to complete firefighter career paths. However, the study neither offered timeframes for taking action, nor required the issue to be resolved. In effect, past studies have noted problems without requiring solutions.

To improve the effectiveness and cost-efficiency of its firefighter training program, FS should identify current and anticipated firefighter needs and develop specific accomplishment goals to measure its progress in meeting them. While more than three-quarters of FS' critical firefighter positions have an average age greater than 50, a recent review showed a general balance in the age distribution of its firefighters when viewed across the ranks of its entire workforce.<sup>24</sup> To ensure FS has the qualified firefighter leaders it needs for the future, employees who volunteer for training should be directed to positions that meet FS' local, regional, and national identified

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<sup>21</sup> *Management Efficiency Assessment of the Interagency Wildland Fire Training and Related Services*, prepared by Management Analysis, Inc. (July 24, 2008).

<sup>22</sup> *Where Have All the Firefighters Gone*, prepared by the Brookings Institution (July 2001).

<sup>23</sup> *Wildland Firefighter Safety Awareness Study*, prepared by Tridata Corporation, Phase II (February 1997) and Phase III (March 1998); *Where Have All the Firefighters Gone*; *Federal Fire Training Strategy* prepared by the Federal Fire Training Task Group (February 2002); *Quadrennial Fire Review* (June 2005 and January 2009), prepared by various Federal fire management teams; and *Management Efficiency Assessment of the Interagency Wildland Fire Training and Related Services*, prepared by Management Analysis, Inc. (July 2008).

<sup>24</sup> *Quadrennial Fire Review*, January 2009.

needs. Training approval procedures should also be modified to require fire training officers to document their concurrence or non-concurrence with employees' planned firefighting courses.

To provide accountability, managers' annual performance plans and evaluations should reflect their progress in achieving individual and agency training goals. Individual employees should also be held accountable for timely progress on their firefighter training by incorporating assessments of their training progress into their annual performance plans and annual evaluations or by creating firefighter training contracts with specific requirements and consequences for non-performance. To encourage employees to obtain certifications in those firefighter positions where they are most needed, FS should also create incentives, such as cash awards and formal recognition for those employees who complete their certifications.

Finally, FS should increase the role of fire training officers who should be responsible for: (a) collaborating with managers and training personnel to maintain efficiency and effectiveness, (b) conducting outreach to engage employees in fire training, (c) ensuring trainees' timely progress to qualify for positions that meet FS' needs, and (d) facilitating timely trainee deployment to support the qualification process. FS' outreach is especially important for the fire militia staff whose day-to-day duties do not involve wildfire suppression. According to senior FS officials, participation in training and firefighting for militia is dropping partly because they are unfamiliar with the firefighter training program and career paths. FS' outreach may include making information about the benefits available and proactive mentoring to guide militia through FS' firefighter training.

### **Recommendation 6**

Identify current and anticipated local, regional, and national firefighter needs and develop specific training accomplishment targets to measure progress in meeting them.

### **Agency Response**

FS concurs with this audit recommendation. Specific focus on identifying current and anticipated needs for training all firefighters and developing methods to ensure that training meets those needs will be part of the National Firefighting Workforce and Succession Plan that will be developed in response to Recommendation Number 2, and a part of the larger overall Strategic Plan to redesign the agency's firefighting business model that the WfSST will undertake. The responses to Recommendations Numbers 4 and 5 address incorporating local and regional needs which will guide organizational configurations based on program demands. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 7**

Require those employees who elect to participate in firefighter training to pursue firefighter qualifications in those positions most needed according to the agency's local, regional, and national goals.

### **Agency Response**

FS generally concurs with this audit recommendation. Agency-wide use of the Fire and Aviation Management Career Assessment Tool (FAMCAT) and Long-Term Individual Development Plan (LTIDP) process for all firefighters outlined in response to Recommendation Number 6 will ensure that employees who undertake firefighting training will do so in alignment with the agency's firefighting goals, as outlined in the National Firefighting Workforce and Succession Plan and the Strategic Plan for redesigning the agency's firefighting business practices.<sup>25</sup> FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 8**

Modify current employee training approval procedures to require that fire training officers document their concurrence or non-concurrence with employees' planned firefighting courses.

### **Agency Response**

FS generally concurs with this audit recommendation. FS believes this role is more appropriate for an employee's supervisor. Supervisors will document their concurrence or non-concurrence with the employee's training plan as a result of implementation of the FAMCAT and LTIDP processes outlined in Recommendation Number 6. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

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<sup>25</sup> See FS' complete response to Recommendation 6 at the end of this audit report which discusses its use of FAMCAT and LTIDP.

## **Recommendation 9**

Hold managers accountable for the training accomplishment targets established in Recommendation 6 by incorporating them into their annual performance plans and evaluations.

### **Agency Response**

FS generally concurs with this audit recommendation. Managers will be heavily involved in ensuring that their employees meet their training needs as identified in their LTIDPs. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. The Plan will identify the best method to ensure managers are held appropriately accountable for meeting the agency's firefighting training needs. The agency will then take the appropriate actions – as outlined in the Plan – after they are approved by agency leadership. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 10**

Hold employees accountable for the timely completion of their firefighter training by incorporating assessments of their progress into their individual development plans and annual evaluations or by creating firefighter training contracts with specific requirements and consequences for non-performance.

### **Agency Response**

FS generally concurs with this audit recommendation. Employee accountability will be accomplished through the development and use of the LTIDP process outlined in Recommendation Number 6. Copies of these LTIDPs will be held in each region at one central location so they can be assessed and reported on to ensure accountability for training completion. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 11**

To encourage employees to obtain certifications in those firefighter positions where they are most needed, create incentives, such as cash awards and formal recognition for those employees who complete their certifications.

## **Agency Response**

FS generally agrees with this recommendation. The WfSST will investigate options for incentives and evaluate which ones will be most effective, based in part on work done in the *Southern Region Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with OPM, HRM, and Union input, assistance, and/or agreement as necessary. FS' estimated completion date for this action is March 31, 2011.

## **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 12**

Increase the role of training officers to be responsible for (a) collaborating with managers and training personnel to maintain efficiency and effectiveness, (b) conducting outreach to engage employees in fire training, (c) ensuring trainees' timely progress to qualify for positions that meet FS' needs, and (d) facilitating timely trainee deployment to support the qualification process.

## **Agency Response**

FS generally concurs with this audit recommendation. A key responsibility of the WfSST will be to further explore training and outreach options and address these issues as part of the strategy and plan for increasing employee participation in fire. FS believes some of these responsibilities are more appropriate for an employee's supervisor. Implementation of the FAMCAT and LTIDP process as outlined in Recommendation Number 6 will ensure that managers and employees are working together closely to ensure that employees are effectively and efficiently obtaining training and deploying in accordance with the agency's needs. FS' estimated completion date for this action is March 31, 2011.

## **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## Section 3: Availability

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### Finding 2: FS' Firefighting Ability Challenged by Lack of Participation

FS' ability to effectively suppress wildfires is challenged by a lack of participation from its firefighters. We determined that voluntary availability and the lack of career incentives have caused most FS firefighters to list themselves as unavailable for the growing number of large, costly fires where they are needed most. As a result, FS faces larger and lengthier wildfire suppression efforts with fewer firefighters, which increases the risk to natural resources, property, and the safety of firefighters.

FS pays to train its employees for firefighting positions but has no formal policy that specifies whether wildfire suppression participation is mandatory or voluntary. After they qualify for firefighter positions, FS practice is to let employees choose whether they will be available for firefighting, what positions they will fill, and where they can be deployed (local, regional, national incidents). Employees who choose to volunteer and are called to duty are not rewarded for doing so but are only evaluated in terms of their primary job responsibilities (e.g., soil scientist). Similarly, qualified employees who do not volunteer are not penalized. Although FS directs its managers to ensure firefighters on their staff are available to participate in local, regional, and national wildland fire incidents as the situation demands,<sup>26</sup> managers are also expected to ensure employees' primary work is accomplished.

This arrangement creates a career disincentive for firefighting availability. For example, a soil scientist who serves as an incident commander risks a lower evaluation if his primary work suffers. A manager who makes her employees available opens herself to a lower rating if they are called to a fire and cannot accomplish their local work. Since FS offers no counterbalancing incentives, such as extra firefighting pay or adjusted work targets, managers and employees have largely chosen not to participate. For example, according to a 2001 study, 88 percent of FS' incident qualified staff said supervisory reluctance to release them for firefighting affected their ability to participate in wildfire emergencies.<sup>27</sup> This number mirrors the availability rate in 2008 when 91 percent of FS' qualified firefighters listed themselves as unavailable to fight national and regional wildfires.

The lack of participation means that FS has the fewest firefighters available to fight the largest, costliest wildfires. Local fires, which 59 percent of firefighters were available for, are typically suppressed more quickly and with fewer resources than larger, more dangerous, national and regional fires. While only 1 percent of wildfires escape FS' early suppression efforts and grow into national and regional fires, they account for 85 percent of FS' suppression costs (averaging over \$1 billion per year). Over the years, drought and accumulated fuels (e.g., underbrush) have increased both the frequency and ferocity of these large fires, which has escalated their threat to natural resources and surrounding communities. We believe this trend will likely be exacerbated if FS continues to fight national and regional fires with only 9 percent of its qualified staff.

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<sup>26</sup> FS Manual 5104.22 (June 2005) and 5120.45 (July 2005).

<sup>27</sup> *Where Have All the Firefighters Gone*, prepared by the Brookings Institution (July 2001).

According to an interagency study, mega-fires invariably occur when wildfires stretch capacity and firefighting resources are low.<sup>28</sup>

In addition, a shortage of available firefighters impacts FS' suppression strategies and timeframes. For example, FS may be forced to compensate for fewer firefighters by selecting less aggressive suppression strategies that contain wildfires more slowly at increased risk to nearby natural resources, property, and communities. In addition, those firefighters who are available may be deployed more often and without full crews, which places them in stressful and dangerous situations. This disproportionate burden on the few who volunteer nationally and regionally may worsen over the next 10 years as 86 percent of FS' most experienced and qualified firefighters retire.

To ensure its continued effectiveness in wildfire suppression, we recommend that FS: (1) determine an appropriate level of mandatory participation for qualified firefighters, and (2) provide incentives to managers and employees to counterbalance the impact on local job performance.

### **Mandatory Availability**

Overall, FS firefighter participation is low. During the 2008 fire season, only 2,170 of 24,323 qualified firefighters were available for regional and national assignments.<sup>29</sup> The rest were either unavailable for any firefighting or limited their availability to local fires.<sup>30</sup> This general unavailability directly impacts FS' ability to assemble full complements of firefighting teams and consequently impacts firefighting effectiveness and safety.

For example, over a 6-week period (July 19 through August 29, 2007), FS needed to deploy 19,579 firefighters to national wildfires but could not fill 5,816 positions—30 percent of the firefighters needed were not available.<sup>31</sup> As shown in the table below, for some critical positions, the percentage of unfilled requests was significantly higher.

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<sup>28</sup> The Mega-Fire Phenomenon: Toward a More Effective Management Model (September 20, 2005).

<sup>29</sup> The number of FS' available firefighters was estimated using the Resource Ordering Support System (ROSS) database which tracks availability. ROSS does not track the number of individuals who choose to reject fire assignments when called to duty, so FS employees' actual participation might be less than the availability numbers indicate.

<sup>30</sup> Firefighter availability is tracked in ROSS and updated daily. Since ROSS does not contain historical data, we identified and averaged FS firefighter availability based on samples taken for August 20, September 22, October 7, and December 3, 2008.

<sup>31</sup> These numbers are based on firefighter requests from FS and the Department of the Interior. FS' figures could not be isolated because this national data is only maintained on an interagency basis. However, FS is the lead Federal fire management agency and places and fills the majority of firefighter orders.

<b>Critical Incident Position</b>	<b>Ordered</b>	<b>Unfilled</b>	<b>Percent Unfilled</b>
Helicopter Coordinator	32	23	72 percent
Strike Team Leader, Dozer	30	21	70 percent
Helibase Manager (type 1)	168	110	65 percent
Safety Officer, Line	250	156	62 percent
Strike Team Leader, Crew	315	172	55 percent

**Table Showing Percentage of Unfilled Orders for Critical Firefighting Positions (July 19 - August 29, 2007)**

The unavailability of such key personnel can affect both safety and strategy. For example, the safety officer is responsible for identifying and evaluating hazardous conditions and ensuring that safety procedures are followed. Helicopter coordinators are critical to large, complex fires because they oversee the tactical deployment of multiple helicopters—ensuring pilots are properly qualified, identifying flight hazards, and ordering helicopter resources sufficient to support the firefighting effort.

According to interagency fire reports, incident management teams (IMTs) routinely report firefighting resource shortages as one of their most difficult challenges.<sup>32</sup> At the height of the fire season, many IMTs place orders for firefighting resources that come back unable to be filled for days or weeks at a time. For example, one IMT reported being unable to fill most of its firefighter resource requests and having to “cobble together” resources it could borrow from other agencies and other IMTs to stop a fire that threatened a small community. Another reported that a mid-air collision nearly occurred between two helicopters due, in part, to unfilled requests for helicopter coordinators who would have overseen the tactical deployment of the helicopters and identified and prevented any flight hazards. Other IMTs tasked with suppressing multiple fires at the same time reported that shortages of needed personnel prevented them from responding as ordered. Instead, they were reduced to attacking one fire at a time while the remaining fires burned.

Shortages of firefighters due to insufficient participation has led FS to recruit its retired employees to supplement its wildland fire workforce. These former employees, referred to as “administratively determined” (AD), are intended to provide a short-term increase in FS’ wildfire response capability during extreme emergency situations. However, due to the limited availability of its firefighters, FS is increasingly relying on ADs to meet its general wildfire response needs. In 2008, FS had significant numbers of ADs in 51 of the 54 critical firefighter positions. In some cases, ADs represented nearly half of FS’ critical wildfire responders. Reliance on ADs is problematic because these individuals have already retired and increase the cost of FS’ wildfire suppression activities. For example, in addition to

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<sup>32</sup> IMTs are composed of specific types of qualified personnel (i.e., command, operations, logistics, planning, and finance) who coordinate and manage wildfires and other types of emergency responses.

receiving their Federal retirement annuity, some ADs earned more than \$70,000 during a single fire season.

### Career Incentives

Since firefighting is a collateral, voluntary duty, qualified employees are only evaluated according to their primary job performance (e.g., biologist, accountant, etc.). FS policy states that employees should support the agency's wildfire suppression activities by participating, or by taking up the critical work left by those who do deploy. However, when firefighters are called to duty, many FS managers do not adjust primary job expectations or provide substitute workers, which leaves firefighters less time to accomplish the same amount of work when they return from duty. Therefore, it is usually against employees' best interests to make themselves available for firefighting. Due to their size and complexity, fighting regional and national fires can be especially detrimental to an employee's primary job performance since they are not credited for the firefighting work they perform while away on longer and more frequent deployments.

FS managers are also reluctant to approve availability requests by staff because their own evaluations may suffer if local work targets are not met. As with employees, FS neither adjusts its expectations of managers nor provides replacements for deployed staff, which leaves managers faced with accomplishing the same amount of work with fewer personnel. Since FS does not hold managers accountable for making their staff available—despite the direction to the contrary previously discussed—managers also find it in their best interest to deny or limit their approval for firefighting duty. We found that some supervisors do not let their staff volunteer for any firefighting work.

Another disincentive is that firefighters do not always receive pay commensurate with their firefighting duties. Under FS' current system, firefighters do not receive compensation based on the nature and complexity of the positions they hold during a fire. Instead, they are paid at their primary job's salary, which can lead to inequities. For example, a biologist who is paid \$19 per hour but is qualified to be an incident commander will be paid as a biologist even though he or she is responsible for the overall management of FS' wildfire suppression efforts, including firefighting strategy, tactics, and safety.

Employees holding the same fire position may also receive different pay. For example, while the biologist earns \$19 per hour serving as an incident commander, an engineer who makes \$38 per hour will receive twice as much for the same firefighting work. Alternately, the engineer may serve in a less critical position (e.g., support dispatcher), but still be paid more than the biologist who is an incident commander. Consequently, highly qualified firefighters may be dissuaded from volunteering for critical positions based on their primary job's pay.

FS managers have known for some time that firefighter shortages were occurring. However, because FS had always managed to effectively respond to wildfires in the past, many managers believed that current practices were adequate. While FS is regarded as the premier wildland fire management agency, shortages in critical firefighter personnel may begin to negatively affect its ability to safely and effectively manage incidents and control costs. In order for FS workforce planning efforts to be successful, greater numbers of incident qualified staff must participate in

wildfire emergencies. To accomplish this, we recommend that FS identify optimal participation numbers and require qualified firefighters and trainees to make themselves available for deployment to local, regional, and national fires as the agency's needs dictate. In addition, FS should require personnel with multiple qualifications to be available for the positions that are needed most.

To enable employees to participate when needed, FS managers should also adjust employee work targets while away on firefighting duty or provide temporary replacement staff. To ensure that managers make their employees available for firefighting duty as directed, FS should establish and monitor participation targets based on the agency's local, regional, and national wildland firefighting needs and hold managers accountable for meeting these targets by modifying their annual performance plans and evaluations to include their firefighting responsibilities. FS should also determine whether incentives such as increased pay for performance would significantly increase employee participation. If so, FS should determine the cost benefit of implementing such a change. Finally, FS should identify and remove other obstacles preventing firefighter participation and implement other incentives that would increase firefighter participation.

### **Recommendation 13**

Identify optimal participation numbers and require qualified firefighters and trainees to be available for local, regional, and national fire assignments according to FS' needs.

### **Agency Response**

FS generally concurs with this audit recommendation and agrees that the agency's firefighting ability has been challenged by lack of participation. The agency will continue to develop and take additional steps to address this challenge. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business model, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify appropriate participation numbers and outline actions necessary to ensure that participation is incentivized to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions – as outlined in the Plan – after they are approved by agency leadership. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 14**

Direct managers to adjust employee work targets while away on firefighting duty or provide temporary replacement staff.

## **Agency Response**

FS generally agrees with the third Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that challenge is important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Number 2. That plan will identify actions necessary to ensure that participation is incentivized and programs of work are adjusted to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions – as outlined in the Plan – after they are approved by agency leadership. FS' estimated completion date for this action is March 31, 2011.

## **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 15**

Establish and monitor annual firefighter participation targets based on the agency's local, regional, and national wildland firefighting needs.

## **Agency Response**

FS generally agrees with the Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that challenge is important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify appropriate participation numbers and outline actions necessary to ensure that participation is incentivized to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions – as outlined in the Plan – after they are approved by agency leadership. FS' estimated completion date for this action is March 31, 2011.

## **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## **Recommendation 16**

Modify managers' annual performance plans and evaluations to include their responsibility for meeting agency firefighter participation targets.

## **Agency Response**

FS generally agrees with the third Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that challenge is

important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify actions to ensure that managers encourage firefighting participation in alignment with the agency's redesigned firefighting business model. The agency will then take the appropriate actions – as outlined in the Plan – after they are approved by agency leadership. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 17**

Evaluate whether incentives such as increased pay for performance would significantly increase employee participation. If so, determine the cost benefit of implementing such a change.

### **Agency Response**

FS generally agrees with this audit recommendation. The WfSST will evaluate whether incentives would increase employee participation and if so, determine the cost-benefit of implementing them. The WfSST will begin with the work done in the *Southern Region Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with OPM, HRM, and Union input, assistance, and/or agreement as necessary. FS' estimated completion date for this action is March 31, 2011.

### **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Recommendation 18**

Identify and remove other obstacles preventing firefighter participation and implement other incentives that would increase firefighter participation.

### **Agency Response**

FS generally agrees with this recommendation. The WfSST will identify other obstacles preventing firefighting participation and determine whether incentives could be implemented that would increase participation. The WfSST will begin with the work done in the *Southern Regional Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with OPM, HRM, and Union input, assistance, and/or agreement as necessary. FS' estimated completion date for this action is March 31, 2011.

## OIG Position

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

### **Finding 4: Unnecessary Education Requirements Compromise FS' Firefighting Force**

FS' ability to fight fires may soon be compromised if FS continues to classify certain of its fire management staff under a job series for natural resources management and biological sciences (GS-401). The series makes academic coursework a precondition for employment, but many FS staff may not meet this requirement by an October 2010 deadline established by the Office of Personnel Management (OPM). Although intended to increase safety by upgrading certain fire management staffs' educational requirements, classifying these staff under the GS-401 series will likely have the opposite effect. FS may soon be fighting fires with less than half of its key fire management staff available to oversee firefighting operations and firefighter safety. Further, FS has invested considerable resources in employees' taking classes required by the job series (e.g., college physics), even though these classes are only loosely related to their jobs (e.g., fire program manager). In light of the risk and increased costs, FS should discontinue use of the job series for specified positions and decide on a more appropriate series based on the skills and knowledge needed by its fire management staff.

Safety concerns arising from prior fire accidents motivated FS and four other agencies<sup>33</sup> to develop interagency fire program management (IFPM) standards to improve fire knowledge and training for key fire management positions.<sup>34</sup> FS also elected to develop similar fire program management standards for a number of sub-unit positions unique to the agency in a process referred to as FS Fire Program Management (FS-FPM). Based on these standards, FS asked OPM to create a new job series for certain of its fire management positions.<sup>35</sup> Since OPM seeks to use existing job series whenever possible, it instead suggested that FS use existing job series. After consulting with DOI, FS chose to classify six of the IFPM positions and four of the FS-FPM positions into GS-401 ("General Biological Sciences").<sup>36</sup> The GS-401 series required either a degree in a relevant field or 24 semester units in biology or natural resources management.

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<sup>33</sup> The four agencies are the Bureau of Land Management, the Fish and Wildlife Service, the National Park Service, and the Bureau of Indian Affairs, all under the Department of the Interior (DOI). These four agencies are FS' major Federal firefighting partners.

<sup>34</sup> Subsequent reports on the prior fire accidents called for agency administrators and senior managers to take interagency courses related specifically to firefighting to ensure that they had the fire training and knowledge necessary to effectively manage and oversee wildland fire programs and operations. (See *Federal Wildland Fire Management Policy and Program Review*, Final Report (December 1995); *Final Report of the Interagency Management Review Team: South Canyon Fire* (June 1995); and *Identifying the Organizational Culture, Leadership, Human Factors, and Other Issues Impacting Firefighter Safety*, prepared by the TriData Corporation (October 1996).)

<sup>35</sup> The IFPM fire management positions targeted for the GS-401 job series were unit fire program manager, geographic area fire program manager, national fire program manager, center manager, wildland fire operations specialist, and prescribed fire and fuels specialist. The targeted FS-FPM positions included unit fire program manager, sub-unit fire program manager, sub-unit wildland fire operations specialist, and sub-unit fire and fuels specialist. The use of the term "fire management staff" throughout this finding refers only to those FS staff in one of the positions identified by the IFPM or FS-FPM process for reclassification to the GS-401 series.

<sup>36</sup> OPM policy allows Federal agencies to reclassify positions if and when changes in duties and responsibilities make a current classification inappropriate. Reclassification actions should include an agency's analysis of the targeted position's responsibilities and why the reclassification action is warranted. Actions involving a professional job series with education requirements such as GS-401 must also justify the use of the job series by demonstrating that the targeted position cannot be performed by individuals lacking the required education. A Federal agency cannot choose to reclassify an existing position into a professional job series simply because it wishes to professionalize its workforce. At the time of our

IFPM's purpose was to increase firefighter safety through standardized fire position descriptions and mandatory firefighter training. Recognizing that college degrees or their equivalent in biology or natural resource management were not geared towards the technical knowledge needed by its fire staff, FS and DOI worked with OPM to develop a fire specific supplemental education standard they could use when qualifying fire staff for the GS-401 positions. Use of this supplemental standard was a key component of the IFPM process. According to IFPM coordinators, Agriculture and Interior department officials directed a hold on IFPM implementation until OPM's approval of the supplemental standard.

OPM initially agreed to accept more focused courses developed by FS and its DOI partner agencies specifically related to firefighting, such as fire risk assessment and fire management leadership. In July 2002, OPM approved the Supplemental Qualification Standard for GS-401 Fire Management Specialist positions that outlined specific National Wildfire Coordinating Group (NWCG) firefighter courses FS and DOI staff could take to meet the series' positive education requirement. There was no expectation at the time that FS and DOI fire staff would be required to have college degrees or their equivalent in biology and natural resource management to meet the IFPM Standard.

In October 2004, FS began to transition IFPM affected fire management staff into the new series.<sup>37</sup> Six months later, in February 2005, OPM announced that only classes at accredited colleges would count for professional series such as GS-401. The new policy was initiated due to OPM's concerns about the use of "diploma mills" to meet positive education requirements. The NWCG fire courses listed on the supplemental standard, although taught by fire experts and highly regarded in the firefighter community, did not qualify as credits obtained from an accredited college or university. FS sought a waiver from OPM to allow continued use of the NWCG fire courses when qualifying staff for the IFPM and FS-FPM fire positions. OPM refused, because setting aside the academic education requirements of the GS-401 series was contrary to Federal regulation and would set a poor precedent for other Federal agencies that also used professional series. According to OPM, if FS wished to continue using the GS-401 series, employees would have to meet the series' academic requirements.

OPM's policy change placed FS in a difficult position because many of its key fire management staff were suddenly not qualified for positions they had held for years. Hundreds of hours spent in fire courses that focused on sharpening the technical skills necessary to manage fires were no longer sufficient. Instead, these fire staff risked being removed from their positions if they did not complete classes such as physics and microbiology by the IFPM October 1, 2010, deadline.<sup>38</sup>

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audit, FS provided no evidence that it had performed the appropriate analysis to justify its reclassification actions or its selection of the GS-401 job series for the six IFPM and four FS-FPM fire management positions.

<sup>37</sup> FS-FPM was implemented at a later date (October 2008) with a 2013 completion deadline.

<sup>38</sup> FS' fire staff are subject to two October 2010 deadlines. The OPM deadline applies to those FS fire staff who were transitioned into GS-401 positions and later determined not to meet the series' educational requirements. These individuals must meet the GS-401 education requirements by October 2010 or be removed from their current positions. FS fire staff still in the process of being reclassified to the GS-401 series are subject to an interagency IFPM deadline of October 2010. This deadline can be extended if FS chose to do so; however, at the time of our audit there was no indication that FS planned to extend the IFPM deadline. FS fire staff not meeting the GS-401 education requirement by the IFPM deadline are also subject to removal from their current positions.

FS considered switching to a job series that did not require academic coursework, but did not pursue the change because it wanted to be consistent with DOI, which was continuing to classify its fire staff using the GS-401 series. The 1995 Federal Wildland Fire Management Policy and Program Review recommended that Federal wildland fire agencies establish uniform fire management qualifications standards to improve firefighter safety and increase the level of skill and competence in fire management programs. To maintain interagency consistency, FS continued with the GS-401 series despite its concerns.

Our review concluded that the lack of a connection between the GS-401 series' academic requirements and fire staffs' professional proficiency could diminish FS' firefighting effectiveness and safety. Time and money devoted to college classes takes away from focused fire training that strengthens specific fire management skills and knowledge. For example, FS has spent a significant amount of its training budget for its fire staff to take courses satisfying the GS-401 job series' requirements instead of improving their job performance. We estimate the overall cost to be at least \$15.7 million based on 656 employees needing to take 24 academic credits at an average cost of \$1,000 per credit.<sup>39</sup> In terms of safety, FS receives little value for every training dollar spent on its fire staff taking microbiology classes. Also, some veteran fire personnel have chosen to retire rather than to take unnecessary college classes in order to qualify for jobs they have performed successfully for decades. In our interviews, many echoed the opinion of one fire manager who wrote:

*I have made a personal decision to remove myself from the fire management position (slated for reclassification to the GS-401 series). I cannot support a system that does not take into consideration 36 years of experience, 300 hours of fire management training, and indicates that I am not qualified to be a professional fire manager because I lack 24 college credits.*

In addition to losing fire staff with proven track records, these losses also affect FS' firefighter succession planning because there will be fewer veteran managers to mentor the next generation of firefighters. It also makes it more difficult for FS to recruit new firefighters in States like California where firefighting organizations have no such education requirement.

Since those FS fire staff subject to the GS-401 education requirement work full-time and are needed during the fire season, it is likely that few will be able to obtain the units needed to keep their jobs. At the time of our audit, we estimated that up to 236 of FS' 456 IFPM affected fire staff slated for classification to this series (52 percent) might not meet the educational requirements by the October 2010 deadline.<sup>40</sup> As a result, in the 2010 fire season and beyond, FS may find itself fighting fires with less than half of its key fire staff.

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<sup>39</sup> This amount is based on FS' \$1,000 per credit estimate that includes anticipated travel costs for 456 IFPM and 200 FS-FPM employees but excludes salaries and university tuition that are also reimbursed by the Government. It also assumes impacted fire staff lack any courses meeting the series' specific education requirements and therefore reflects a "worse-case" scenario. However, given the technical nature of fire staffs' previous job requirements and FS' conservative per unit cost estimate, we believe this estimate more accurately reflects the series' financial impact. FS could not provide us actual cost data relating to GS-401 related courses because it does not currently track this information.

<sup>40</sup> Because the FS-FPM process was implemented at a later date and has a 2013 deadline, only IFPM affected employees were included in this estimate, which at the time of our audit comprised 162 employees who had not begun or completed their qualifying classes and 74 employees whose qualifying courses might be rejected because FS approved classes without ensuring they met OPM's academic requirements. In addition to specifying types, OPM also requires that classes go towards a single major (e.g., biology). So, a fire manager may have the required number of units (24), but the classes may be spread so that they do not satisfy a single major's requirements. For example, a manager who has taken physics,

To prevent this from happening, we reported our findings to the former FS Chief in November 2008 in a management alert that recommended FS discontinue using the GS-401 job series to reclassify its fire staff for the IFPM fire management positions previously discussed. We also recommended that FS coordinate with OPM to develop an alternative to classifying the IFPM fire management positions under the GS-401 job series. For example, in light of the series' failure to reflect firefighters' specialized education and training, FS can work with OPM to justify its need for a unique firefighter series.

After discussing our concerns with FS officials prior to the issuance of the management alert and recognizing that use of the GS-401 series has been, and continues to be, very controversial within the agency, FS' former Chief felt it appropriate to take some immediate action while OIG finishes its review and issues a formal report. In October 2008, the former Chief directed all FS units to stop further implementation of the GS-401 series at grades GS-9 through 12. Ongoing training in courses with college accreditation was allowed to continue for those employees considering progressing to leadership positions at the GS-13 grade level and above. According to the former Chief, once the final report is issued, FS will assess the recommended actions and develop the appropriate policy and path forward. The path forward will include appropriate series classifications that meet the operational needs of FS. In its December 2008 written response to the management alert, FS stated it had issued interim direction further clarifying the former Chief's position on the limited use of the GS-401 job series until the OIG report is issued.

### **Recommendation 19**

Immediately discontinue the use of the GS-401 series to reclassify staff for the six IFPM and four FS-FPM fire management positions.

### **Agency Response**

FS did not respond to this recommendation.

### **OIG Position**

Management decision pending FS' response.

### **Recommendation 20**

Coordinate with OPM to develop an alternate to classifying the IFPM and FS-FPM fire management positions under the GS-401 job series, such as creating a new wildland firefighter series, or classifying staff under existing series with more appropriate experience and training requirements.

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botany, zoology, meteorology, and entomology will likely not meet the GS-401 series' education requirement even though he/she has taken a sufficient number of classes. Since FS approved 74 managers based on the number and type of classes but not their major grouping, an upcoming qualification review by OPM may disqualify some or all of them. Given that fire management staff subject to the FS-FPM process may also fail to meet the GS-401 education requirements, the number of FS employees subject to possible termination could be considerably higher than the cited estimate.

## **Agency Response**

FS will continue to coordinate with OPM and DOI to explore alternatives to classifying these fire management positions under the GS-401 job series, including creating a new wildland firefighter series or classifying staff under an existing series. FS' estimated completion date for this action is March 31, 2011.

## **OIG Position**

We accept FS' management decision on this recommendation. For final action, FS needs to provide the Office of the Chief Financial Officer documentation showing that the agreed upon action has been taken.

## ***Scope and Methodology***

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The purpose of our review was to assess the adequacy of FS' overall succession planning activities relating to its critical wildland fire personnel. Our audit primarily covered planning, recruitment, retention, and training policies and procedures affecting FS' ability to meet its future wildfire suppression responsibilities. We also evaluated other factors or barriers affecting FS' ability to fulfill its primary wildfire suppression mission.

To accomplish our audit objectives, we performed audit work at FS' National Headquarters in Washington, D.C.; National Interagency Fire Center in Boise, Idaho; Albuquerque Service Center in Albuquerque, New Mexico; and Northern California Geographic Area Coordination Center in Redding, California. In addition, we contacted OPM to obtain information on position classification procedures and the education requirements of the GS-401 series.

While FS staff perform 361 different firefighter functions, our audit analyses focused primarily on 54 positions that FS and OIG determined to be the most critical to effective wildfire management. In completing this review, we looked at documentation generally covering the period 2004 to the present. Fieldwork was performed between March 2008 and April 2009.

In developing the findings in this report, we performed the following steps and procedures:

### At FS' National Headquarters:

- Reviewed applicable laws, regulations, policies, and procedures pertaining to the preparation and implementation of a workforce succession plan.
- Interviewed key FS national headquarters staff to obtain an understanding of current FS firefighter succession planning activities, including FS' recruitment and retention strategies, firefighter training program, and firefighter mobilization process.
- Interviewed key FS national headquarters staff to obtain an understanding of the IFPM process and its effect on firefighter recruitment and retention.

### At the National Interagency Fire Center:

- Met with key FS staff prior to the initiation of the audit to obtain their insights, observations, and concerns relating to FS' firefighter succession planning process and used this input to guide the development of our audit coverage.
- Discussed FS' firefighter training, qualification, and mobilization processes and recruitment and retention activities.
- Ascertained how firefighter data is input, maintained, and updated in IQCS and ROSS to facilitate an in-depth analysis of firefighter training, qualification, and mobilization information.

At the Albuquerque Service Center:

- Discussed workforce planning activities with key FS staff and the extent to which firefighters are included in those planning activities.
- Interviewed Human Capital Management (HCM) staff to obtain an understanding of FS' interpretation of the GS-401 education requirements and the status of HCM's academic education reviews.
- Obtained and reviewed IFPM employee data used to quantify the number of FS employees affected by FS' use of the GS-401 series and possible costs associated with that activity.

At the Northern California Geographic Area Coordination Center:

- Interviewed key interagency wildfire support staff to obtain an understanding of the firefighter training and mobilization processes in place at the local, geographic, and national levels.
- Obtained and reviewed IQCS and HCM data pertaining to FS firefighter training, mobilization, and retirement processes. The HCM data we obtained from FS was unaudited. We conducted limited testing of the IQCS data while reconciling it with the HCM data.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Abbreviations**

AD.....	Administratively Determined
DOI .....	Department of Interior
FAM.....	Fire and Aviation Management
FAMCAT .....	Fire and Aviation Management Career Assessment Tool
FS .....	Forest Service
FS-FPM.....	Forest Service Fire Program Management
HCM .....	Human Capital Management
HR.....	Human Resources
HRM .....	Human Resources Management
IDP .....	Individual Development Plan
IFPM .....	Interagency Fire Program Management
IMT .....	Incident Management Team
IQCS .....	Incident Qualification and Certification System
LTIDP .....	Long-Term Individual Development Plan
NWCG .....	National Wildfire Coordinating Group
OIG .....	Office of Inspector General
OPM.....	Office of Personnel Management
ROSS.....	Resource Ordering Support System
USDA.....	United States Department of Agriculture
WfP&PA.....	Workforce Planning and Program Analysis
WfSST.....	Workforce and Succession Planning Strategic Team

## Exhibit A: Summary of Monetary Results

Recommendation Number	Description	Amount	Category
7	Annual amount FS paid for training courses its employees took that <b>never qualified</b> for firefighter positions	\$11,800,000 (estimated)	FTBPTBU <sup>41</sup> – Management Improvements
19	Amount FS will pay for employees to take college courses <b>unrelated</b> to firefighting in order to meet the GS-401 series' educational requirements	\$15,700,000 (estimated)	FTBPTBU – Management Improvements
TOTAL		\$27,500,000	

Exhibit A presents the two recommendations we made to the agency where future savings would occur if the agency took the recommended actions. There are four columns in this exhibit. The first column lists the recommendation number. The second column describes why the funds were inefficiently used. The third column states the amount of funds that were inefficiently used. The fourth column states the funds could be put to better use through management improvements.

<sup>41</sup> FTBPTBU – Funds To Be Put To Better Use

## **Exhibit B: Difference in Number of Qualified firefighters Versus Trainees in FS'Critical Firefighter Positions**

Critical Firefighter Position	No. of Qualified	Avg. Age Qualified	No. of Trainees	Avg. Age Trainee	Difference <sup>42</sup>
<b>Area Command:</b>					
Area Commander	6	57.7 yrs	4	56.6 yrs	-2 (33%)
Area Commander Aviation Coordinator	9	57.7 yrs	5	54.3 yrs	-4 (44%)
Assistant Area Commander, Planning	14	60 yrs	4	56 yrs	-10 (71%)
Assistant Area Commander, Logistics	8	60.9 yrs	7	57.9 yrs	-1 (13%)
<b>Total No. and Average Age – Area Command</b>	<b>37</b>	<b>59.3 yrs<sup>2</sup></b>	<b>20</b>	<b>56.4 yrs<sup>2</sup></b>	
<b>Command &amp; General:</b>					
Incident Commander, Type 1	27	55.7 yrs	3	49 yrs	-24 (89%)
Incident Commander, Type 2	66	54.5 yrs	33	51.3 yrs	-33 (50%)
Incident Commander, Type 3	817	48.3 yrs	456	41.7 yrs	-361 (44%)
Safety Officer, Type 1	32	57.5 yrs	20	54.5 yrs	-12 (38%)
Safety Officer, Type 2	274	55.8 yrs	125	51.7 yrs	-149 (54%)
Safety Officer, Line	131	52.3 yrs	226	44.2 yrs	+95 (73%)
Public Information Officer, Type 1	60	56.7 yrs	48	51.3 yrs	-12 (20%)
Public Information Officer, Type 2	191	54.5 yrs	115	52.7 yrs	-76 (40%)
<b>Total No. and Average Age – Command &amp; General</b>	<b>1,598</b>	<b>51.5 yrs<sup>2</sup></b>	<b>1,026</b>	<b>45.7 yrs<sup>2</sup></b>	
<b>Operations:</b>					
Operations Section Chief, Type 1	70	53.8 yrs	27	52.5 yrs	-43 (61%)
Operations Section Chief, Type 2	287	53 yrs	168	48.6 yrs	-119 (41%)
Division/Group Supervisor	1,171	48.8 yrs	363	40.8 yrs	-808 (69%)
Task Force Leader	1,341	44.3 yrs	581	38.3 yrs	-760 (57%)
Structure Protection Specialist	16	56.5 yrs	8	46.6 yrs	-8 (50%)
Strike Team Leader, Tractor/Plow	13	51.7 yrs	2	48.5 yrs	-11 (85%)
Strike Team Leader, Dozer	258	47.5 yrs	41	43.7 yrs	-217 (84%)
Strike Team Leader, Engine	998	45.1 yrs	368	37.5 yrs	-630 (63%)
Strike Team Leader, Crew	1,336	45.1 yrs	403	37.8 yrs	-933 (70%)
<b>Total No. and Average Age – Operations Group</b>	<b>5,490</b>	<b>46.4 yrs<sup>2</sup></b>	<b>1,961</b>	<b>39.7 yrs<sup>2</sup></b>	
<b>Air Operations:</b>					
Air Operations Branch Director	68	54.3 yrs	30	53.8 yrs	-38 (56%)
Air Support Group Supervisor	119	51.9 yrs	44	47.3 yrs	-75 (63%)
Air Tactical Group Supervisor	141	54 yrs	106	46.6 yrs	-35 (25%)
Helibase Manager, Type 1	169	47.6 yrs	71	43.9 yrs	-98 (58%)
Helibase Manager, Type 2	267	45.7 yrs	120	40.2 yrs	-147 (55%)
Helicopter Manager	158	44.1 yrs	36	36.1 yrs	-122 (77%)
Helicopter Coordinator	30	53.8 yrs	24	46.2 yrs	-6 (20%)
<b>Total No. and Average Age – Air Operations Group</b>	<b>952</b>	<b>48.6 yrs<sup>2</sup></b>	<b>431</b>	<b>44.0 yrs<sup>2</sup></b>	

<sup>42</sup> Difference = Number of Qualified – Number of Trainees

Critical Firefighter Position	No. of Qualified	Avg. Age Qualified	No. of Trainees	Avg. Age Trainee	Difference <sup>1</sup>
<b>Planning:</b>					
Planning Section Chief, Type 1	45	57.9 yrs	6	54.6 yrs	-39 (87%)
Planning Section Chief, Type 2	95	57 yrs	19	57.5 yrs	-76 (80%)
Situation Unit Leader	97	53.6 yrs	76	50.1 yrs	-21 (22%)
Resource Unit Leader	257	52.8 yrs	142	53.4 yrs	-115 (45%)
Demobilization Unit Leader	142	53.7 yrs	65	51.2 yrs	-77 (54%)
Fire Behavior Analyst	86	52.1 yrs	25	47.7 yrs	-61 (71%)
Long Term Fire Analyst	33	51.1 yrs	17	46.3 yrs	-16 (48%)
<b>Total No. and Average Age – Planning Group</b>	<b>755</b>	<b>53.8 yrs<sup>2</sup></b>	<b>350</b>	<b>51.8 yrs<sup>43</sup></b>	
<b>Logistics:</b>					
Logistics Section Chief, Type 1	46	58 yrs	10	53.8 yrs	-36 (78%)
Logistics Section Chief, Type 2	114	58.2 yrs	19	54.9 yrs	-95 (83%)
Food Unit Leader	88	58.2 yrs	65	54.2 yrs	-23 (26%)
Communication Unit Leader	76	54.5 yrs	13	48.1 yrs	-63 (83%)
Supply Unit Leader	132	55.5 yrs	51	53.7 yrs	-81 (61%)
Facility Unit Leader	186	57.1 yrs	57	51.7 yrs	-129 (69%)
Ground Support Unit Leader	144	57.4 yrs	77	54.9 yrs	-67 (47%)
Base/Camp Manager	248	53.8 yrs	211	48.3 yrs	-37 (15%)
Equipment Manager	267	55.3 yrs	323	50.4 yrs	+56 (21%)
Incident Communications Center Mgr.	95	52.5 yrs	87	50.4 yrs	-8 (8%)
Ordering Manager	212	52.9 yrs	141	51.8 yrs	-71 (33%)
<b>Total No. and Average Age – Logistics Group</b>	<b>1,608</b>	<b>55.4 yrs<sup>2</sup></b>	<b>1,054</b>	<b>51.0 yrs<sup>2</sup></b>	
<b>Finance/Administration:</b>					
Finance Section Chief, Type 1	37	56.5 yrs	11	56.2 yrs	-26 (70%)
Finance Section Chief, Type 2	73	55.9 yrs	24	53.8 yrs	-49 (67%)
Cost Unit Leader	99	52.7 yrs	62	51.9 yrs	-37 (37%)
Procurement Unit Leader	30	50.3 yrs	23	48.1 yrs	-7 (23%)
Time Unit Leader	153	53.7 yrs	87	51.8 yrs	-66 (43%)
Compensation/Claims Unit Leader	57	55.5 yrs	21	54.2 yrs	-36 (63%)
<b>Total No. and Average Age – Finance/Admin. Group</b>	<b>449</b>	<b>54.1 yrs<sup>2</sup></b>	<b>228</b>	<b>52.1 yrs<sup>2</sup></b>	
<b>Dispatch:</b>					
Expanded Dispatch Coordinator	53	56.2 yrs	36	54.2 yrs	-17 (32%)
Expanded Dispatch Supv. Dispatcher	187	54 yrs	93	49.2 yrs	-94 (50%)
<b>Total No. and Average Age – Dispatch Group</b>	<b>240</b>	<b>54.5 yrs<sup>2</sup></b>	<b>129</b>	<b>50.6 yrs<sup>2</sup></b>	
<b>Total Number of Responders</b>	<b>11,129</b>		<b>5,199</b>		
<b>Average Age of All Groups</b>		<b>49.6 yrs<sup>2</sup></b>		<b>45.3 yrs<sup>2</sup></b>	
<b>Overall Number of Trainee Imbalance (%)</b>					<b>-5,930 (53%)</b>

<sup>43</sup> Calculated totals reflect weighted averages as of July 18, 2008.

Exhibit B presents the difference in the number of qualified firefighters holding critical firefighting positions versus those training for the positions. There are six columns in this exhibit. The first column lists the critical firefighter position. The second column lists the number of qualified firefighters currently holding the critical firefighter position. The third column lists the average age of the qualified firefighters. The fourth column lists the number of firefighters training for the critical firefighter position. The fifth column lists the average age of the trainees. The sixth column shows the percentage difference between the numbers of qualified firefighters holding the critical firefighting position versus those training for the position.

## **Exhibit C: Estimated Percentage of Employees That Did Not Obtain Certification after Attending Training for Firefighting Positions**

<b>Course Number</b>	<b>Course Description</b>	<b>Target Position<sup>44</sup></b>	<b>Number Attending Class</b>	<b>Projected Number Not Obtaining Certification<sup>45</sup></b>	<b>Estimated Training Inefficiency (%)<sup>46</sup></b>
S-403	Incident Information Officer	Incident Information Officer (Type 2)	43	43	100%
S-470	Air Operations Branch Director	Air Operations Branch Director	11	11	100%
S-460	Finance/Administration Section Chief	Finance/Administration Section Chief (Type 2)	1	1	100%
S-271	Helicopter Crewmember	Helicopter Crew Member	258	230	89%
S-330	Task Force/Strike Team Leader	Task Force Leader/Strike Team Leader	900	783	87%
S-400	Incident Commander	Incident Commander (Type 2)	10	9	87%
S-378	Air Tactical Group Supervisor	Air Tactical Group Supervisor	41	31	76%
S-430	Operations Section Chief	Operations Section Chief (Type 2)	36	27	75%
S-404	Safety Officer	Safety Officer (Type 2)	111	81	73%
S-354	Facilities Unit Leader	Facilities Unit Leader	23	14	61%
S-450	Logistics Section Chief	Logistics Section Chief (Type 2)	7	4	57%
S-300	Incident Commander - Extended Attack	Incident Commander (Type 3)	187	101	54%
S-203	Introduction to Incident Information	Public Information Officer	144	76	53%

Exhibit C presents the estimated percentage of employees that did not obtain certification after attending training for firefighting positions. There are six columns in this exhibit. The first

<sup>44</sup> All of the firefighter positions listed below are critical except for the Incident Information Officer (Type 2) and the Helicopter Crew Member. These were included to also illustrate the high degree of inefficiency in non-critical positions.

<sup>45</sup> The "Projected Number Not Obtaining Certification" was calculated by multiplying the "Estimated Training Inefficiency" by the "Number Attending Class."

<sup>46</sup> The "Estimated Training Inefficiency" was calculated by adding together the percentage of FS staff who (1) attended a fire training class but did not initiate the next step (i.e., did not open a position task book) and (2) opened a position task book but then allowed it to expire. Fire training and position task book data was obtained from IQCS.

column lists the course number. The second column lists the course description. The third column lists the target position for which the employee was seeking certification. The fourth column lists the number of employees attending the class. The fifth column lists the projected number of employees attending the class that did not obtain a certification. The sixth column shows the estimated training inefficiency.

**USDA'S**

**FOREST SERVICE**

**RESPONSE TO AUDIT REPORT**



**File Code:** 1430/5100

**Date:** March 29, 2010

**Route To:**

**Subject:** Response to Office of the Inspector General Official Draft Report No. 08601-54-SF, "Forest Service's Firefighting Succession Planning Process"

**To:** Robert W. Young, Assistant Inspector General for Audit, Office of Inspector General, USDA

The Forest Service has reviewed the Office of the Inspector General (OIG) draft Audit Report No. 08601-54-SF, Forest Service's Firefighting Succession Planning Process. The Agency appreciates OIG's review of its fire and aviation program and fire response activities. This audit identifies fundamental issues that we too recognize spring from the Agency's longstanding firefighting business practices. The Forest Service generally supports Findings 1 through 4 and corresponding Recommendations 1 through 20; and the urgent need to address these issues. However, numerous ongoing intra- and interagency efforts must be considered and integrated.

The Secretaries of the Department of Agriculture and the Department of the Interior are also focusing on wildland fire management through development of the Cohesive Strategy required in the FLAME Act. Three components comprise this strategy: 1) landscape-scale restoration; 2) fire adapted communities; and 3) wildland fire response. This audit addresses, in part, the third component, response to fire. Be assured that we are intent on determining its changing role in large fire suppression, how we fulfill that role (e.g. contract, force account, local cooperators, etc.), and the corresponding workforce needed to implement that role.

Other concurrent efforts include, but are not limited to:

- Master Agreement National Federation of Federal Employees Negotiations,
- The interagency firefighter study,
- Modifications to the 2003 Implementation Guide for the Federal Wildland Fire Management Policy,
- The National Wildfire Coordinating Group analysis of Incident Management Team succession,
- Fire Program Analysis including both initial response and large fire response, and
- The connection to Interagency Fire Program Management and Forest Service-Fire Program Management.

All these efforts figure in the changing nature of wildland fire management, and relate to the overall decline in participation, particularly by the "militia," on large fire management and support. They point to the ongoing challenge of maintaining the viable workforce necessary to manage hazardous fuels and wildland fire in the current environment.



Based on careful consideration of the audit findings and other ongoing efforts, a new business model is required to address the report's recommendations. Eight of the recommendations in Findings 2 and 3 outline tactical actions that attempt to fix the Agency's firefighting business model. While we concur with the conclusions, the Agency would be better served by designing and implementing a new model rather than expending the energy needed to repair a decades-old model that no longer serves its purpose. We recognize that we cannot continue to manage our large fires as we have in the past. We will develop a strategy that will set our future course for wildland firefighting. Elements of that strategy will be based on the Workforce and Succession Plan model recently prepared by our Southeast Region. This plan was prepared by national, regional, and Human Resource Management Workforce Planning staff; it addresses many of the issues in this report.

The enclosed response outlines our proposed actions for each of the audit recommendations. Please contact Donna Carmical, Chief Financial Officer, at (202) 205-1321 or [dcarmical@fs.fed.us](mailto:dcarmical@fs.fed.us) with any questions.

*/s/ Hank Kashdan (for)*  
THOMAS L. TIDWELL  
Chief

cc: Sandy T Coleman  
Jaelith H Rivera  
Wm C Waterbury

Enclosure

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United States Department of Agriculture  
Forest Service (FS)

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**Office of Inspector General (OIG) Official Draft Audit Report No. 08601-54-SF  
Forest Service's Firefighting Succession Planning Process**

**March 25, 2010**

**FS Response to Official Draft Report**

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**OIG Recommendation 1: Assign responsibility for firefighter qualification workforce planning to a top level official at the FS Washington office.**

**FS Response to Recommendation No. 1:** The FS concurs with this audit recommendation and will assign the responsibility for firefighter qualification workforce planning to the Director, Fire and Aviation Management (FAM). The Director, FAM, will work in close coordination and support with the Director, Human Resources Management. This firefighter qualification workforce planning process will address firefighter position qualifications for all firefighters, including the militia. This relationship and expected results will be formally documented in a letter to both the Directors.

**Estimated Completion Date:** April 15, 2010

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**OIG Recommendation 2: Establish a team to initiate, guide and monitor the agency's firefighter workforce planning process.**

**FS Response to Recommendation 2:** The FS concurs with this audit recommendation and will establish an interdisciplinary "Workforce and Succession Planning Strategic Team" (WfSST) that includes staff from Human Resources Management (HRM), Fire and Aviation Management (FAM), and other national, regional and local line and staff, as applicable. The WfSST will be formed to focus on creation of a Strategic Plan for redesigning the agency's firefighting business model. The Director of FAM will designate a program manager for this Team who will report directly to the Director, FAM. The WfSST Program Manager will initiate, guide and monitor the agency's overall firefighter workforce planning effort, which will cover fire management positions and the "militia", utilizing FS workforce planning efforts underway. Currently the FS uses the Workforce Planning and Program Analysis (WfP&PA) tool and develops a Workforce Plan to facilitate workforce planning throughout all levels of the agency. The agency will build on those efforts, but will address all firefighters, not just those job codes are specific to fire management.

**Estimated Completion Date:** April 30, 2010

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**OIG Recommendation 3: Create a unique identifier for each FS employee in both the IQCS and HR database that codes the employee's position as a fire-staff or fire-militia to facilitate analysis needed to support firefighter workforce planning.**

**FS Response:** The FS concurs with this audit recommendation. This task will be coordinated by the FAM WfSST Program Manager. The Program Manager will work in collaboration with HRM to determine the needed resources, the feasibility of the work, the resources required to implement such an identifier, and implications to other agencies and cooperators. This action is likely to require a full year for feasibility study alone.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 4: Develop a national workforce plan based on firefighters' position qualifications that focuses on identifying, assessing, and meeting specific workforce needs relative to FS' strategic goals and objectives and that establishes specific regional and unit goals and timeframes in relation to national firefighter qualification needs.**

**FS Response:** The FS concurs with this audit recommendation. Development of the National Firefighting Workforce and Succession Plan, which will address firefighter position qualifications for all firefighters, including the militia, will be overseen by the WfSST established in response to Recommendation Number 2, by working closely with the HRM Workforce Planning unit. The analysis of current staffing and current known vacancies will be assessed near term using current workforce planning tools and other efforts underway at the FS. The ensuing plan will form the basis for redesigning the agency's current firefighting business model and will address all firefighters, including the militia.

Each Region will assess the extent and nature of its respective FAM organizations and militia responders based on metrics which characterize fire occurrence, fuel types, fuels treatment/fire recurrence intervals, coordination, cooperator capability etc. Currently, each Region utilizes the Workforce Planning and Program Analysis (WfP&PA) tool to address workforce planning. Regional data is included in a standard template and published in Workforce Plans as required by Human Resources Management (HRM) guidance. As the regional plans are broadened to address all firefighters, including militia, and then finalized, the Regional plans can then be rolled up into the overall National Workforce and Succession Plan.

**Estimated Completion Date:** January 31, 2011

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**OIG Recommendation 5: Develop specific action plans and timelines for regional and local managers to follow in meeting the firefighter position qualification needs identified in Recommendation 4.**

**FS Response:** The FS concurs with this audit recommendation. Currently, each Region utilizes the Workforce Planning and Program Analysis (WfP&PA) tool to address workforce planning. Regional data is included in a standard template and published in Workforce Plans as

required by Human Resources Management (HRM) guidance. As the Regional plans that address all firefighters are finalized, the Regional plans can then be rolled up into the overall National Workforce and Succession Plan that will address all firefighters, including militia. The combined Regional responses will comprise the basis for the national Firefighting Workforce and Succession Plan (ref. response to Recommendation Number 4). Action plans will be prepared by the local units and compiled by each Region identifying how to meet **all** firefighter position needs identified in the National Firefighting Workforce and Succession Plan. The Plan will note specific timelines to meet national objectives.

**Estimated Completion Date:** January 31, 2011

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**OIG Recommendation 6: Identify current and anticipated local, regional, and national firefighter needs and develop specific training accomplishment targets to measure progress in meeting them.**

**FS Response:** The FS concurs with this audit recommendation. Specific focus on identifying current and anticipated needs for training all firefighters and developing methods to ensure that training meets those needs will be a part of the national Firefighting Workforce and Succession Plan (WfSSP) that will be developed in response to Recommendation Number 2, and a part of the larger overall Strategic Plan to redesign the agency's firefighting business model that the WfSST will undertake. The responses to Recommendations Numbers 4 and 5 address incorporating local and regional needs which will guide organizational configurations based on program demands.

The FAM Career Assessment Tool (FAMCAT) was developed last fiscal year by the Southern Region and Human Resource Management. FAMCAT is currently operational in the Southern Region. FAMCAT is a long-range planning tool for use by supervisor and employee to identify the preferred career pathway and establish steps in both training and experience required to successfully compete and potentially promote to the identified desired position. The companion piece to the FAMCAT is the "Long-term Individual Development Plan" (LTIDP). The LTIDP is a multi-year expansion of the annual Individual Development Plan (IDP). The LTIDP documents the agreed upon pathway from current position to the next long-term goal via the Training plan between the agency and the employee. This will assist in matching employee skills and development with current and future agency needs for skills and depth.

The LTIDP also formalizes the agreement between the employee and the agency by addressing career pathways, training and experience. This provides for career planning and exemplifies the agency as an "employer of choice" by providing the employee with the prerequisites necessary to compete for agency vacancies. The LTIDP also concurrently provides the agency with a pool of motivated and competitive candidates trained and suited to vacancies necessary to carry out the agency's updated business model as outlined in the strategic plan. The agency will expand these tools' use to other Regions to assist in matching employee skills and development with current and future needs for skills and depth identified by the Strategic Plan, the National Workforce and Succession Plan and HRM analysis of needs. They will be utilized to identify career pathways both for full-time fire management staff, but also for fire "militia" personnel.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 7: Require those employees who elect to participate in firefighter training to pursue firefighter qualifications in those positions most needed according to the agency's local, regional, and national goals.**

**FS Response:** The FS generally concurs with this audit recommendation. Agency-wide use of the FAMCAT and LTIDP process for **all** firefighters outlined in response to Recommendation Number 6 will ensure that employees who undertake firefighter training will do so in alignment with the agency's firefighting goals, as outlined in the National Firefighting Workforce and Succession Plan and the Strategic Plan for redesigning the agency's firefighting business practices.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 8: Modify current employee training approval procedures to require that fire training officers document their concurrence or non-concurrence with employees' firefighting courses.**

**FS Response:** The FS generally concurs with this audit recommendation. The FS believes this role is more appropriate for an employee's supervisor. Supervisors will document their concurrence or non-concurrence with the employee's training plan as a result of implementation of the FAMCAT and LTIDP processes outlined in Recommendation Number 6.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 9: Hold managers accountable for the training accomplishment targets established in Recommendation 6 by incorporating them into their annual performance plans and evaluations.**

**FS Response:** The FS generally concurs with this audit recommendation. . Managers will be heavily involved in ensuring that their employees meet their training needs as identified in their LTIDPs. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. The Plan will identify the best method to ensure managers are held appropriately accountable for meeting the agency's firefighting training needs. The agency will then take the appropriate actions - as outlined in the Plan - after they are approved by agency leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 10: Hold employees accountable for the timely completion of their firefighter training by incorporating assessments of their progress into their individual**

**development plans and annual evaluations or by creating firefighting training contracts with specific requirements and consequences for no-performance.**

**FS Response:** The FS generally concurs with this audit recommendation. Employee accountability will be accomplished through the development and use of the LTIDP process outlined in Recommendation Number 6. Copies of these LTIDPs will be held in each region at one central location so they can be assessed and reported on to ensure accountability for training completion.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 11:** To encourage employees to obtain certifications in those firefighter positions where they are most needed, create incentives, such as cash awards and formal recognition for those employees who complete their certifications.

**FS Response:** The FS generally agrees with this recommendation. The WfSST will investigate options for incentives and evaluate which ones will be most effective, based in part on work done in the *Southern Region Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with Office of Personnel Management, Human Resources Management, and Union input, assistance and/or agreement as necessary.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 12:** Increase the role of training officers to be responsible for (a) collaborating with managers and training personnel to maintain efficiency and effectiveness, (b) conducting outreach to engage employees in fire training, (c) ensuring trainees' timely progress to qualify for positions that meet FS' needs, and (d) facilitating timely trainee deployment to support the qualification process.

**FS Response:** The FS generally concurs with this audit recommendation. A key responsibility of the WfSST will be to further explore training and outreach options and address these issues as part of the strategy and plan for increasing employee participation in fire. The FS believes some of these responsibilities are more appropriate for an employee's supervisor. Implementation of the FAMCAT and LTIDP process as outlined in Recommendation Number 6 will ensure that managers and employees are working together closely to ensure that employees are effectively and efficiently obtaining training and deploying in accordance with the agency's needs.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 13:** Identify optimal participation numbers and require qualified firefighters and trainees to be available for local, regional, and national fire assignments according to FS' needs.

**FS Response:** The FS generally concurs with this audit recommendation and agrees that the agency's firefighting ability has been challenged by lack of participation. The agency will continue to develop and take additional steps to address this challenge. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business model, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify appropriate participation numbers and outline actions necessary to ensure that participation is incentivized to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions - as outlined in the Plan - after they are approved by agency leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 14: Direct managers to adjust employee work targets while away on firefighting duty or provide temporary replacement staff.**

**FS Response:** The FS generally agrees with the third Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that challenge is important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Number 2. That plan will identify actions necessary to ensure that participation is incentivized and programs of work are adjusted to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions - as outlined in the Plan - after they are approved by agency leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 15: Establish and monitor annual firefighter participation targets based on the agency's local, regional, and national wildland firefighter needs.**

**FS Response:** The FS generally agrees with the Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that challenge is important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify appropriate participation numbers and outline actions necessary to ensure that participation is incentivized to align with the agency's redesigned firefighting business model. The agency will then take the appropriate actions - as outlined in the Plan - after they are approved by agency leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 16: Modify managers' annual performance plans and evaluations to include their responsibility for meeting agency firefighting participation targets.**

**FS Response:** The FS generally agrees with the third Finding that the agency's firefighting ability has been challenged by lack of participation and that taking steps to address that

challenge is important. The WfSST will develop a Strategic Plan for redesigning the agency's current firefighting business practices, as discussed in response to Recommendation Numbers 2 and 6. That plan will identify actions to ensure that managers encourage firefighting participation in alignment with the agency's redesigned firefighting business model. The agency will then take the appropriate actions - as outlined in the Plan - after they are approved by agency leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 17: Evaluate whether incentives such as increased pay for performance would significantly increase employee participation. If so, determine the cost benefit of implementing such a change.**

**FS Response:** The FS generally agrees with this audit recommendation. The WfSST will evaluate whether incentives would increase employee participation and if so, determine the cost-benefit of implementing them. The WfSST will begin with the work done in the *Southern Region Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with Office Personnel Management, Human Resources Management, and Union input, assistance and/or, agreement as necessary.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 18: Identify and remove other obstacles preventing firefighting participation and implement other incentives that would increase fighter participation.**

**FS Response:** The FS generally agrees with this recommendation. The WfSST will identify other obstacles preventing firefighting participation and determine whether incentives could be implemented that would increase participation. The WfSST will begin with the work done in the *Southern Region Workforce and Succession Plan*. Development and implementation of these incentives will occur in coordination with Office Personnel Management, Human Resources Management, and Union input, assistance and/or, agreement as necessary. The WfSST will document the results of its analysis and present its findings/ recommendations to the FS executive leadership.

**Estimated Completion Date:** March 31, 2011

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**OIG Recommendation 19: Immediately discontinue the use of the GS-401 job series for the six IFPM and four FS-FPM fire management positions.**

**FS Response:** TBD

**Estimated Completion Date:** TBD

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**OIG Recommendation 20: Coordinate with OPM to develop an alternative to classifying the IFPM and FS-FPM fire management positions under the GS-401 job series, such as creating a new wildland firefighter series, or classifying staff under existing series with more appropriate experience and training requirements.**

**FS Response:** FS will continue to coordinate with OPM and the Department of the Interior to explore alternatives to classifying these fire management positions under the GS-401 job series, including creating a new wildland firefighter series or classifying staff under an existing series.

**Estimated Completion Date:** March 31, 2011